

EXHIBIT 1

Exhibit 1 to L. Harris Decl. ISO Google's Motion for Attorneys' Fees

Date	Timekeeper	Hours	Value	Narrative
03/14/22	Meyer, Chris	1.8	1,025.10	Review defendants' motion papers
03/14/22	Meyer, Chris	0.9	512.55	Meet with M. Bush, L. Roniger, and P. Weeks regarding reply motion for default
03/14/22	Michaelson, Andrew	1.5	1,759.50	Review defendants' motion papers regarding default
03/14/22	Roniger, Luke	0.9	772.65	Meet with P. Weeks, C. Meyer, and M. Bush regarding next steps for response to Defendants' Motion to Vacate Entry of Default
03/14/22	Roniger, Luke	1.0	858.50	Review Defendants' motion to vacate entry of default and supporting case law
03/14/22	Weeks, Paul	0.9	730.58	Participate in call with M. Bush, L. Roniger, and C. Meyer to discuss response to Defendants' motion to vacate default and to dismiss action
03/14/22	Weeks, Paul	2.1	1,704.68	Review Defendants' motion to vacate default and potential responses thereto
03/14/22	Weeks, Paul	1.9	1,542.33	Research underlying facts related to Defendants' factual assertions regarding service of process
03/15/22	Harris, Laura	1.0	969.00	Participate in team meeting regarding Defendants' motion to vacate default
03/15/22	Roniger, Luke	1.0	858.50	Meet with team regarding response to Defendants' motion to vacate entry of default
03/15/22	Roniger, Luke	0.8	686.80	Review Defendants' motion to vacate entry of default and supporting materials
03/15/22	Roniger, Luke	0.9	772.65	Edit outline and brief for opposition and cross motion regarding Defendants' motion to vacate entry of default and Google motion for default judgment/permanent injunction
03/15/22	Weeks, Paul	1.3	1,055.28	Research case law regarding adequacy of service of process where there was compliance with service rules or order but purportedly no actual receipt
03/15/22	Weeks, Paul	1.0	811.75	Participate on team call to discuss Defendants' motion to vacate default and to dismiss and our response thereto
03/16/22	Meyer, Chris	1.2	683.40	Research caselaw for purposes of challenging forum non conveniens argument in default motion
03/16/22	Meyer, Chris	1.1	626.45	Research caselaw regarding prejudice element of default judgment
03/16/22	Meyer, Chris	1.2	683.40	Research caselaw regarding pleading standard for challenging meritorious defense for default motion
03/16/22	Roniger, Luke	1.8	1,545.30	Revise MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction
03/16/22	Roniger, Luke	0.4	343.40	Review refuting Defendants' claims regarding Defendants' schemes and their connection to the botnet for MOL response to Defendants' motion
03/16/22	Roniger, Luke	1.0	858.50	Review and analyze Defendants' motion to vacate entry of default

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03/16/22	Roniger, Luke	1.3	1,116.05	Review MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction
03/16/22	Roniger, Luke	0.7	600.95	Meet with M. Bush and P. Weeks regarding edits to MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction and related research
03/16/22	Weeks, Paul	0.7	568.23	Participate in call with L. Roniger and M. Bush to discuss motion for default judgment and opposition to Defendants' motion to vacate default and to dismiss action
03/16/22	Weeks, Paul	0.7	568.23	Research Defendants' factual assertions regarding rent.dont.farm and Google users leasing accounts to Defendants for opposition to motion to vacate
03/17/22	Meyer, Chris	0.5	284.75	Review revised default judgment motion
03/18/22	Harris, Laura	0.6	581.40	Communicate with team concerning draft opposition to defendants' motion to vacate default
03/18/22	Roniger, Luke	0.4	343.40	Review research for MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction
03/18/22	Roniger, Luke	0.7	600.95	Meet with P. Weeks regarding edits to MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction and related research
03/18/22	Weeks, Paul	0.5	405.88	Participate in call with L. Roniger and M. Bush to discuss motion for default judgment and opposition to Defendants' motion to vacate default and to dismiss action
03/18/22	Weeks, Paul	1.1	892.93	Draft standard of review for brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default and to dismiss action
03/18/22	Weeks, Paul	0.2	162.35	Participate in call with M. Bush to discuss merits section of brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default and to dismiss action
03/18/22	Weeks, Paul	2.1	1,704.68	Review underlying facts regarding Defendants' motion to set aside default and to dismiss action
03/19/22	Harris, Laura	0.7	678.30	Review draft personal jurisdiction argument
03/19/22	Roniger, Luke	0.3	257.55	Meet with P. Weeks regarding edits to MOL ISO Default Judgment/Permanent Injunction
03/19/22	Roniger, Luke	2.1	1,802.85	Review MOL opposing defendants' motion to vacate and in support of Google's motion for default judgment and permanent injunction
03/19/22	Roniger, Luke	2.4	2,060.40	Revise MOL opposing defendants' motion to vacate and in support of Google's motion for default judgment and permanent injunction
03/19/22	Weeks, Paul	1.4	1,136.45	Conduct legal research in support of arguments regarding RICO's enterprise element for default motion
03/19/22	Weeks, Paul	2.0	1,623.50	Conduct legal research in support of arguments regarding forum non conveniens
03/19/22	Weeks, Paul	2.3	1,867.03	Research legal arguments regarding personal jurisdiction and waiver to support opposition to Defendants' motion to vacate default judgment and to dismiss
03/19/22	Weeks, Paul	2.1	1,704.68	Conduct legal research in support of arguments regarding RICO extraterritoriality for default motion
03/19/22	Weeks, Paul	0.3	243.53	Participate in call with L. Roniger to discuss draft opposition to Defendants' motion to vacate default judgment and to dismiss

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03/19/22	Weeks, Paul	2.1	1,704.68	Draft legal argument section regarding personal jurisdiction in opposition to Defendants' motion to vacate default judgment and to dismiss
03/19/22	Weeks, Paul	1.8	1,461.15	Conduct legal research in support of arguments regarding tortious interference with business relationship claim for opposition to motion to vacate
03/19/22	Weeks, Paul	1.5	1,217.63	Revise standard of review section in opposition to Defendants' motion to vacate default judgment and to dismiss
03/19/22	Weeks, Paul	1.1	892.93	Analyze argument regarding waiver of personal jurisdiction for opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Roniger, Luke	1.4	1,201.90	Review MOL ISO Default Judgment/Permanent Injunction and in response to Defendants' motion to vacate
03/20/22	Roniger, Luke	0.4	343.40	Meet with P. Weeks regarding edits to MOL responding to Defendants' motion to vacate and ISO Default Judgment/Permanent Injunction and related research
03/20/22	Roniger, Luke	2.4	2,060.40	Revise background section of MOL ISO Default Judgment/Permanent Injunction and in response to Defendants' motion to vacate
03/20/22	Roniger, Luke	0.9	772.65	Revise injunction section of MOL ISO Default Judgment/Permanent Injunction and in response to Defendants' motion to vacate
03/20/22	Roniger, Luke	2.3	1,974.55	Revise personal jurisdiction section of MOL ISO Default Judgment/Permanent Injunction and in response to Defendants' motion to vacate
03/20/22	Roniger, Luke	2.1	1,802.85	Revise meritorious defense section of MOL ISO Default Judgment/Permanent Injunction and in response to Defendants' motion to vacate
03/20/22	Weeks, Paul	2.4	1,948.20	Draft legal argument section regarding service in opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Weeks, Paul	1.5	1,217.63	Draft legal argument section regarding tortious interference in opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Weeks, Paul	2.4	1,948.20	Draft legal argument section regarding RICO in opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Weeks, Paul	0.4	324.70	Participate in call with L. Roniger to discuss draft opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Weeks, Paul	2.4	1,948.20	Draft legal argument section regarding forum non conveniens in opposition to Defendants' motion to vacate default judgment and to dismiss
03/20/22	Weeks, Paul	1.8	1,461.15	Draft opposition to Defendants' motion to vacate default judgment and to dismiss
03/21/22	Harris, Laura	2.4	2,325.60	Communicate with M. Bush regarding revisions to draft motion for default judgment
03/21/22	Harris, Laura	2.4	2,325.60	Revise draft motion for default judgment
03/21/22	Harris, Laura	2.4	2,325.60	Review draft motion for default judgment and revise same
03/21/22	Harris, Laura	2.3	2,228.70	Review Defendants' motion to set aside default
03/21/22	Meyer, Chris	1.2	683.40	Revise draft attorney declaration in support of motion for default judgment

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03/21/22	Meyer, Chris	1.2	683.40	Revise documents supporting attorney declaration for default motion
03/21/22	Michaelson, Andrew	1.2	1,407.60	Review defendants' motion to set aside entry of default
03/21/22	Roniger, Luke	1.2	1,030.20	Revise L. Harris declaration ISO motion for default judgment and permanent injunction
03/21/22	Roniger, Luke	2.1	1,802.85	Revise MOL Opposition to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction (Prejudice and Personal Jurisdiction sections)
03/21/22	Roniger, Luke	1.1	944.35	Revise MOL Opposition to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction (Willfulness and Meritorious Defense sections)
03/21/22	Roniger, Luke	0.7	600.95	Meet with M. Bush regarding MOL Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/21/22	Roniger, Luke	2.4	2,060.40	Revise MOL Opposition to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/21/22	Weeks, Paul	0.5	405.88	Review current draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default
03/22/22	Harris, Laura	2.2	2,131.80	Revise draft declaration in support of motion for default judgment
03/22/22	Harris, Laura	2.3	2,228.70	Revise fact section and preliminary statement in draft default judgment motion
03/22/22	Harris, Laura	2.4	2,325.60	Revise willfulness section of draft motion for default judgment
03/22/22	Harris, Laura	1.7	1,647.30	Communicate with team regarding draft motion for default judgment
03/22/22	Meyer, Chris	0.2	113.90	Finalize exhibits supporting attorney declaration for default motion
03/22/22	Meyer, Chris	1.2	683.40	Revise opposition to vacate entry of default
03/22/22	Michaelson, Andrew	2.1	2,463.30	Revise background section of motion in support of entry of default judgment
03/22/22	Michaelson, Andrew	2.4	2,815.20	Revise argument section of motion in support of entry of default judgment
03/22/22	Roniger, Luke	2.4	2,060.40	Research for MOL in response to Defendants' motion to vacate and ISO Google motion for default judgment and permanent injunction
03/22/22	Roniger, Luke	0.9	772.65	Revise MOL opposing Defendants' motion to vacate and in support of Google's motion for default judgment and permanent injunction
03/22/22	Roniger, Luke	0.2	171.70	Meet with M. Bush regarding edits to MOL Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/22/22	Roniger, Luke	0.4	343.40	Draft insert for MOL Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/22/22	Weeks, Paul	0.9	730.58	Conduct follow up research for brief in support of default judgment for opposition to motion to vacate

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03/22/22	Weeks, Paul	0.3	243.53	Participate in call with L. Roniger to discuss research for opposition to motion to vacate
03/23/22	Harris, Laura	0.7	678.30	Review draft motion for default judgment
03/23/22	Meyer, Chris	0.1	56.95	Revise opposition brief to vacate entry of default
03/23/22	Michaelson, Andrew	0.6	703.80	Revise motion in support of entry of default judgment
03/23/22	Michaelson, Andrew	1.5	1,759.50	Review key case law supporting motion in support of entry of default judgment
03/23/22	Roniger, Luke	0.9	772.65	Revise L. Harris Declaration ISO Google's opposition to Defendants' motion to vacate and ISO Google's motion for default judgment/permanent injunction
03/23/22	Roniger, Luke	1.2	1,030.20	Revise proposed order for default judgment/permanent injunction
03/23/22	Roniger, Luke	0.6	515.10	Revise MOL Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction with edits from N. Kim and team
03/23/22	Weeks, Paul	0.8	649.40	Revise draft proposed order for default judgment and permanent injunction
03/24/22	Harris, Laura	0.8	775.20	Communicate with team regarding motion for default judgment
03/24/22	Harris, Laura	2.4	2,325.60	Review case law underlying motion for default judgment
03/24/22	Harris, Laura	0.5	484.50	Participate in call with M. Bush regarding motion for default judgment
03/24/22	Harris, Laura	2.3	2,228.70	Review willfulness briefing and revise same
03/24/22	Harris, Laura	2.4	2,325.60	Review fact section of motion for default and revise same
03/24/22	Meyer, Chris	2.4	1,366.80	Review accuracy of citations in opposition memorandum of law to vacate entry of default
03/24/22	Meyer, Chris	2.4	1,366.80	Review factual accuracy of declaration citations for default motion
03/24/22	Meyer, Chris	0.5	284.75	Draft factual citations in memorandum of law to vacate entry of default
03/24/22	Michaelson, Andrew	1.3	1,524.90	Revise motion in support of default judgment
03/24/22	Roniger, Luke	0.8	686.80	Revise proposed order for default judgment/permanent injunction
03/24/22	Roniger, Luke	0.7	600.95	Meet with M. Bush and team regarding next steps for MOL and supporting papers for Opposition to Mot to Vacate and Google's Motion for Default Judgment/Permanent Injunction
03/24/22	Roniger, Luke	0.4	343.40	Meet with C. Meyer regarding MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction

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03/24/22	Weeks, Paul	0.7	568.23	Participate in team call to discuss draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default and remaining projects to complete in advance of filing for opposition to motion to vacate
03/24/22	Weeks, Paul	2.4	1,948.20	Check and revise legal citations in brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default
03/25/22	Harris, Laura	2.4	2,325.60	Review declaration in support of default judgment motion and revise same
03/25/22	Harris, Laura	2.3	2,228.70	Review exhibits and revise same
03/25/22	Harris, Laura	2.3	2,228.70	Review RICO section of default judgment motion and revise same
03/25/22	Harris, Laura	1.2	1,162.80	Communicate with team concerning filing draft motion for default judgment
03/25/22	Harris, Laura	2.2	2,131.80	Review proposed order and revise same
03/25/22	Harris, Laura	2.1	2,034.90	Review preliminary statement of default judgment motion and revise same
03/25/22	Harris, Laura	2.3	2,228.70	Review willfulness section of default judgment motion and revise same
03/25/22	Meyer, Chris	2.4	1,366.80	Revise L. Harris declaration for default motion
03/25/22	Meyer, Chris	1.3	740.35	Participate in internal team meeting regarding revisions to default motion brief
03/25/22	Meyer, Chris	2.4	1,366.80	Revise meritorious defense analysis in memorandum of law for default motion
03/25/22	Meyer, Chris	0.3	170.85	Participate in internal team meeting regarding revisions to brief for default motion
03/25/22	Meyer, Chris	2.4	1,366.80	Revise willfulness analysis in memorandum of law for default motion
03/25/22	Michaelson, Andrew	2.0	2,346.00	Revise motion in support of default judgment
03/25/22	Roniger, Luke	0.9	772.65	Revise proposed order for default judgment/permanent injunction
03/25/22	Roniger, Luke	0.5	429.25	Finalize MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction for filing
03/25/22	Roniger, Luke	0.9	772.65	Revise MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction per edits to L. Harris declaration
03/25/22	Roniger, Luke	0.6	515.10	Meet with M. Bush regarding filing logistics, proof of L. Harris declaration, exhibits, and final cite check of MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/25/22	Roniger, Luke	0.4	343.40	Meet with S. Hiers regarding factual cites and exhibits for filing MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
03/25/22	Roniger, Luke	0.6	515.10	Revise MOL ISO Opposing to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction and supporting papers with edits from N. Kim and team

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03/25/22	Roniger, Luke	0.6	515.10	Meet with C. Meyer regarding cite check for MOL and L. Harris declaration
03/25/22	Roniger, Luke	0.6	515.10	Meet with K&S team regarding next steps for finalizing MOL and supporting papers for filing
03/25/22	Roniger, Luke	2.1	1,802.85	Revise L. Harris declaration ISO Opposition to Motion to Vacate and Motion for Default Judgment/Permanent Injunction
03/25/22	Weeks, Paul	1.9	1,542.33	Revise draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default
03/25/22	Weeks, Paul	0.8	649.40	Participate in calls with M. Bush, L. Roniger, S. Harris, and C. Meyer to discuss projects regarding and revisions to draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default
03/25/22	Weeks, Paul	1.7	1,379.98	Participate in team calls to discuss draft papers in support of motion for default judgment and in opposition to Defendants' motion to vacate default and remaining projects to complete in advance of filing
03/25/22	Weeks, Paul	1.8	1,461.15	Finalize papers in support of motion for default judgment and in opposition to Defendants' motion to vacate default and remaining projects to complete in advance of filing
03/25/22	Weeks, Paul	1.1	892.93	Research regarding extraterritorial application for draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default and remaining projects to complete in advance of filing for opposition to motion to vacate
03/25/22	Weeks, Paul	1.4	1,136.45	Revise RICO extraterritoriality section in draft brief in support of motion for default judgment and in opposition to Defendants' motion to vacate default and remaining projects to complete in advance of filing for opposition to motion to vacate
03/26/22	Harris, Laura	0.2	193.80	Review motion for default judgment filings
03/28/22	Harris, Laura	0.4	387.60	Review courtesy copies for the Court
03/28/22	Meyer, Chris	0.5	284.75	Draft materials to provide to court pursuant to judge local rules for default motion
03/28/22	Meyer, Chris	0.5	284.75	Draft letter to court regarding courtesy copies for default motion
03/28/22	Roniger, Luke	0.8	686.80	Finalize courtesy copies of Opposition to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction and cover letter for delivery to J. Cote
03/28/22	Roniger, Luke	0.1	85.85	Meet with C. Meyer regarding courtesy copies of Opposition to Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction and cover letter for J. Cote
04/04/22	Harris, Laura	0.5	484.50	Participate in call with team regarding drafting plan for reply in support of default motion
04/04/22	Roniger, Luke	0.4	333.20	Meet with team regarding research, default judgment filings, and prep for Reply ISO Opposition to Motion to Vacate and Motion for Default Judgment/Permanent Injunction
04/04/22	Weeks, Paul	0.4	324.70	Participate in team call to discuss upcoming reply in support of motion to vacate default
04/08/22	Harris, Laura	1.4	1,356.60	Review defendants' brief in opposition to default judgment
04/08/22	Michaelson, Andrew	1.5	1,759.50	Review defendants' brief regarding default judgment
04/08/22	Roniger, Luke	0.8	666.40	Review Defendants Opposition to Google's Motion for Default Judgment and Permanent Injunction

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04/08/22	Weeks, Paul	2.1	1,704.68	Review Defendants' opposition to motion for default judgment and reply in support of motion to vacate default
04/08/22	Weeks, Paul	1.9	1,542.33	Research case law cited in Defendants' opposition to motion for default judgment and reply in support of motion to vacate default
04/09/22	Harris, Laura	1.1	1,065.90	Review motion for default judgment and defendants' opposition brief
04/09/22	Harris, Laura	1.0	969.00	Participate in call with team regarding draft reply brief in support of default judgment
04/09/22	Michaelson, Andrew	1.5	1,759.50	Review case law concerning personal jurisdiction for default judgment
04/09/22	Roniger, Luke	1.2	999.60	Meet with K&S team regarding next steps for Google Reply brief and research needs ISO Opposition to Motion to Vacate and Motion for Default Judgment/Permanent Injunction
04/09/22	Weeks, Paul	0.9	730.58	Participate on calls with team to discuss draft reply in support of motion for default judgment
04/09/22	Weeks, Paul	2.4	1,948.20	Draft RICO section for reply brief in support of motion for default judgment
04/09/22	Weeks, Paul	2.3	1,867.03	Draft personal jurisdiction section for reply brief in support of motion for default judgment
04/10/22	Roniger, Luke	0.9	749.70	Revise prejudice section of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/10/22	Roniger, Luke	0.9	749.70	Revise Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/10/22	Roniger, Luke	1.4	1,166.20	Revise service of process section of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/10/22	Roniger, Luke	0.8	666.40	Research SDNY case law regarding prejudice for vacating default for Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/10/22	Roniger, Luke	1.0	833.00	Research for Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/10/22	Weeks, Paul	1.9	1,542.33	Research for motion to vacate default
04/11/22	Harris, Laura	0.8	775.20	Communicate with team concerning reply in support of default judgment motion
04/11/22	Harris, Laura	1.2	1,162.80	Revise draft reply in support of motion for default judgment
04/11/22	Michaelson, Andrew	1.5	1,759.50	Review draft reply brief in support of motion for default judgment
04/11/22	Roniger, Luke	0.8	666.40	Revise willfulness section of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/11/22	Roniger, Luke	0.7	583.10	Review cases and prior filings for Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/11/22	Roniger, Luke	1.5	1,249.50	Revise meritorious defense section of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction

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04/11/22	Roniger, Luke	0.4	333.20	Meet with P. Weeks regarding next steps for Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/11/22	Roniger, Luke	0.4	333.20	Revise Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/11/22	Weeks, Paul	2.4	1,948.20	Revise consolidated draft reply in support of motion for default judgment
04/11/22	Weeks, Paul	1.4	1,136.45	Draft CFAA section of reply brief in support of motion for default judgment
04/11/22	Weeks, Paul	1.1	892.93	Participate in calls with L. Roniger to discuss draft reply in support of motion for default judgment
04/12/22	Harris, Laura	1.1	1,065.90	Participate in call with L. Roniger and P. Weeks regarding draft reply in support of default judgment
04/12/22	Michaelson, Andrew	0.8	938.40	Revise preliminary statement of reply brief for default judgment
04/12/22	Roniger, Luke	0.8	666.40	Revise service of process section of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/12/22	Roniger, Luke	1.4	1,166.20	Meet with P. Weeks and L. Harris regarding next steps for Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/12/22	Weeks, Paul	1.4	1,136.45	Participate in team call to discuss draft reply brief in support of motion for default judgment
04/12/22	Roniger, Luke	0.6	499.80	Research for Default Judgment motion
04/13/22	Harris, Laura	0.9	872.10	Communicate with team concerning draft reply in support of motion for default judgment
04/13/22	Harris, Laura	2.4	2,325.60	Review prior briefing and relevant case law in connection with draft reply brief
04/13/22	Harris, Laura	2.3	2,228.70	Revise draft reply in support of default judgment
04/13/22	Roniger, Luke	0.6	499.80	Review botnet research and related documents for Reply brief ISO Opposition to Motion to Vacate and Motion for Default Judgment/Permanent Injunction
04/13/22	Roniger, Luke	1.1	916.30	Revise Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction with edits from L. Harris
04/13/22	Weeks, Paul	1.4	1,136.45	Review and revise draft brief in support of motion for default judgment following initial edits from team
04/13/22	Weeks, Paul	1.9	1,542.33	Conduct legal research regarding arguments raised for the first time in responsive pleading that is combined opposition and reply for motion to vacate default
04/14/22	Harris, Laura	2.4	2,325.60	Revise draft reply in support of default judgment
04/14/22	Meyer, Chris	0.6	341.70	Review draft reply brief for default motion
04/14/22	Michaelson, Andrew	2.4	2,815.20	Revise reply in support of motion for default judgment

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04/14/22	Roniger, Luke	0.1	83.30	Meet with P. Weeks regarding edits and next steps for Reply brief ISO Opposition to Motion to Vacate and Motion for Default Judgment/Permanent Injunction
04/14/22	Roniger, Luke	0.8	666.40	Revise Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction with edits from A. Michaelson and L. Harris
04/14/22	Weeks, Paul	0.5	405.88	Draft emails to team regarding draft reply brief in support of default judgment
04/14/22	Weeks, Paul	1.9	1,542.33	Implement further edits and comments received from team and client to draft reply brief in support of default judgment
04/14/22	Weeks, Paul	0.5	405.88	Draft proposed insert for brief regarding conspiracy theory of personal jurisdiction for draft reply brief in support of default judgment
04/15/22	Harris, Laura	2.4	2,325.60	Revise draft reply in support of motion for default judgment
04/15/22	Harris, Laura	0.7	678.30	Review and revise draft reply in support of motion for default judgment.
04/15/22	Meyer, Chris	1.7	968.15	Revise reply brief for default motion
04/15/22	Michaelson, Andrew	2.2	2,580.60	Revise reply in support of motion for default judgment
04/15/22	Roniger, Luke	0.7	583.10	Meet with P. Weeks regarding edits to Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/15/22	Roniger, Luke	1.5	1,249.50	Revise Reply brief with cite check edits and further edits from L. Harris
04/15/22	Roniger, Luke	1.6	1,332.80	Finalize Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction
04/15/22	Weeks, Paul	1.5	1,217.63	Finalize for filing reply brief in support of motion for default judgment
04/15/22	Weeks, Paul	0.7	568.23	Participate in call with L. Roniger to discuss finalization of reply brief in support of motion for default judgment
04/15/22	Weeks, Paul	0.9	730.58	Revise draft reply brief in support of motion for default judgment
04/18/22	Harris, Laura	0.4	387.60	Review courtesy copies
04/18/22	Roniger, Luke	0.5	416.50	Review courtesy copies of Reply brief Opposing Defendants' Motion to Vacate and ISO Default Judgment/Permanent Injunction for delivery to J. Cote
04/27/22	Harris, Laura	1.0	969.00	Review ruling concerning motion for default judgment
04/27/22	Roniger, Luke	0.2	166.60	Confer with team regarding J. Cote Order & Opinion re Motion to Vacate and Google's Motion for Default Judgment/Permanent Injunction
04/27/22	Roniger, Luke	0.8	666.40	Review J. Cote Opinion & Order re Motion to Vacate and Google's Motion for Default Judgment/Permanent Injunction
04/27/22	Roniger, Luke	0.9	749.70	Analyze J. Cote Opinion & Order re Motion to Vacate and Google's Motion for Default Judgment/Permanent Injunction

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04/27/22	Roniger, Luke	0.1	83.30	Meet with L. Harris regarding J. Cote Opinion & Order re Motion to Vacate and Google's Motion for Default Judgment/Permanent Injunction
04/28/22	Michaelson, Andrew	0.3	351.90	Participate in telephone conference with L. Harris regarding discovery
04/28/22	Roniger, Luke	0.5	416.50	Analyze Defendants' Answer date
04/28/22	Roniger, Luke	0.8	666.40	Research Defendants' answer date
05/02/22	Harris, Laura	0.8	775.20	Communicate with client concerning litigation strategy following ruling on default judgment
05/02/22	Harris, Laura	0.4	387.60	Analyze litigation strategy regarding default judgment ruling
05/03/22	Weeks, Paul	0.8	649.40	Draft email with analysis regarding the strategy for negotiations with Defendants' counsel in meet-and-confer
05/04/22	Roniger, Luke	0.7	583.10	Review and analyze J. Cote Opinion & Order for outreach to Defendants' Counsel for meet and confer
05/04/22	Roniger, Luke	0.5	416.50	Correspondence with Defendants' counsel regarding meet and confer
05/05/22	Michaelson, Andrew	0.2	234.60	Participate in telephone conference with I. Litvak regarding discovery
05/05/22	Weeks, Paul	0.5	405.88	Research case management proposals
05/05/22	Roniger, Luke	0.2	166.60	Review J. Cote Order & Opinion for meet and confer with opposing counsel
05/05/22	Harris, Laura	0.3	290.70	Communicate with I. Litvak regarding meeting
05/06/22	Roniger, Luke	0.6	499.80	Meet with team regarding next steps for outreach to Defendants' Counsel, Rule 26(f) case plan
05/06/22	Harris, Laura	0.3	290.70	Communicate with I. Litvak regarding call
05/06/22	Harris, Laura	0.7	678.30	Participate in call with team in preparation for call with I. Litvak
05/06/22	Harris, Laura	0.3	290.70	Participate in call with team to debrief following call with I. Litvak
05/06/22	Harris, Laura	0.5	484.50	Participate in call with I. Litvak regarding case management schedule, court-ordered communication concerning settlement potential
05/06/22	Michaelson, Andrew	0.5	586.50	Participate in telephone conference with Igor Litvak, and review materials in preparation for same
05/06/22	Roniger, Luke	0.3	249.90	Meet with Defendants' counsel regarding next steps for Rule 16 case plan
05/06/22	Weeks, Paul	0.2	162.35	Participate in call with opposing counsel to meet and confer on case management

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05/09/22	Weeks, Paul	1.7	1,379.98	Draft case management and discovery plan to propose to defendants' counsel
05/10/22	Weeks, Paul	2.2	1,785.85	Draft case management and discovery plan to propose to defendants' counsel
05/11/22	Harris, Laura	0.6	581.40	Communicate with client regarding answer and case management plan
05/11/22	Harris, Laura	0.6	581.40	Review answer and counterclaims
05/11/22	Meyer, Chris	2.0	1,139.00	Analyze defendants' Answer
05/11/22	Weeks, Paul	0.7	568.23	Analyze Defendants' answer and counterclaims for purposes of responding to counterclaims
05/12/22	Harris, Laura	0.6	581.40	Review defendants' answer
05/12/22	Meyer, Chris	1.7	968.15	Analyze defendants' Answer
05/13/22	Harris, Laura	0.6	581.40	Review answer and work product related to same
05/13/22	Michaelson, Andrew	0.8	938.40	Review defendants' Answer
05/13/22	Michaelson, Andrew	0.6	703.80	Review defendants' counterclaims
05/15/22	Harris, Laura	0.8	775.20	Review draft case management plan
05/16/22	Harris, Laura	0.4	387.60	Communicate with team regarding Rule 26(f) report
05/16/22	Harris, Laura	0.6	581.40	Review draft case management plan and revise same
05/16/22	Roniger, Luke	0.8	666.40	Meet with P. Weeks regarding edits to 26(f) report and proposal to Defendants' counsel
05/16/22	Roniger, Luke	0.4	333.20	Revise and circulate updated draft of 26(f) report for team call
05/16/22	Weeks, Paul	0.9	730.58	Participate in call with L. Roniger to discuss discovery plan and action items to prepare for discovery
05/16/22	Weeks, Paul	0.3	243.53	Emails regarding draft discovery plan and upcoming deadlines in case
05/16/22	Weeks, Paul	0.9	730.58	Conduct preliminary research into potential arguments for motion to dismiss Defendants' counterclaims
05/17/22	Harris, Laura	0.3	290.70	Communicate with team regarding response to Defendants concerning Rule 26(f) report
05/17/22	Harris, Laura	0.3	290.70	Communicate with client regarding case management plan

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05/17/22	Roniger, Luke	0.7	583.10	Meet with team regarding next steps for outreach to Defense counsel, 26(f) Discovery Plan, and research needs
05/17/22	Roniger, Luke	0.4	333.20	Review and revise Rule 26(f) Discovery Plan with edits from team
05/17/22	Harris, Laura	0.6	581.40	Participate in call with P. Sawant and P. Weeks regarding motion to dismiss counterclaims
05/17/22	Harris, Laura	0.7	678.30	Participate in call with team regarding discovery preparation, motion to dismiss draft, and communicate with opposing counsel
05/17/22	Michaelson, Andrew	1.0	1,173.00	Review case law concerning motion to dismiss tortious interference claim premised on filing of lawsuit
05/17/22	Sawant, Prachee	0.8	452.20	Analyze complaint and defendants' answer with counterclaims for purposes of moving to dismiss the counterclaims
05/17/22	Sawant, Prachee	0.2	113.05	Call with P. Weeks regarding responses to counterclaims
05/17/22	Sawant, Prachee	0.6	339.15	Call with L. Harris and P. Weeks regarding responses to counterclaims
05/17/22	Weeks, Paul	1.5	1,217.63	Outline and circulate potential arguments for motion to dismiss Defendants' counterclaims and areas for further research
05/17/22	Weeks, Paul	0.8	649.40	Participate in calls with L. Harris and P. Sawant to discuss motion to dismiss Defendants' counterclaims
05/18/22	Harris, Laura	0.5	484.50	Participate in meet and confer with I. Litvak
05/18/22	Michaelson, Andrew	0.7	821.10	Review case management plan
05/18/22	Roniger, Luke	0.4	333.20	Meet with I. Litvak regarding Rule 26(f) discovery plan
05/18/22	Roniger, Luke	0.4	333.20	Draft and circulate update for Google regarding meet and confer with I. Litvak and next steps for Discovery Plan and potential settlement
05/18/22	Roniger, Luke	0.6	499.80	Review and analyze Defendants' proposed edits to Rule 26(f) discovery plan
05/18/22	Weeks, Paul	0.4	324.70	Participate in meet and confer with Defendants' counsel to discuss case schedule, discovery plan, and potential settlement
05/18/22	Weeks, Paul	1.0	811.75	Review research findings regarding potential arguments to dismiss Defendants' counterclaims
05/18/22	Harris, Laura	0.7	678.30	Review materials in preparation for meet and confer with I. Litvak
05/18/22	Harris, Laura	0.6	581.40	Meeting with client concerning meet and confer
05/18/22	Roniger, Luke	0.2	166.60	Emails regarding meet and confer with I. Litvak
05/18/22	Roniger, Luke	0.8	666.40	Meet with K&S team regarding debrief for I. Litvak call, next steps for potential settlement, and 26(f) plan

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05/19/22	Meyer, Chris	0.3	170.85	Participate in call with L. Roniger regarding discovery preparation
05/19/22	Meyer, Chris	1.2	683.40	Draft discovery preparation materials
05/19/22	Meyer, Chris	2.3	1,309.85	Analyze filings for purposes of preparation for discovery
05/19/22	Roniger, Luke	0.6	499.80	Review and compile documents for discovery preparation
05/19/22	Roniger, Luke	0.4	333.20	Meet with C. Meyer regarding discovery preparation
05/19/22	Weeks, Paul	1.7	1,379.98	Draft section in motion to dismiss Defendants' counterclaims under Noerr-Pennington doctrine
05/19/22	Weeks, Paul	1.6	1,298.80	Draft section in motion to dismiss Defendants' counterclaims for failure to state a claim
05/19/22	Weeks, Paul	1.8	1,461.15	Conduct additional research regarding arguments to dismiss Defendants' counterclaims
05/20/22	Meyer, Chris	2.0	1,139.00	Discovery preparation
05/20/22	Roniger, Luke	0.8	666.40	Preparation for discovery
05/20/22	Roniger, Luke	0.8	666.40	Meet with P. Weeks regarding discovery preparation
05/20/22	Roniger, Luke	0.2	166.60	Meet with C. Meyer regarding discovery requests
05/20/22	Harris, Laura	0.7	678.30	Review case law cited in draft motion to dismiss
05/20/22	Harris, Laura	1.2	1,162.80	Review and revise draft motion to dismiss
05/20/22	Sawant, Prachee	0.3	169.58	Confer with team regarding important cases in draft motion to dismiss counterclaims
05/20/22	Weeks, Paul	1.8	1,461.15	Conduct additional research regarding arguments to dismiss Defendants' counterclaims under the litigation privilege
05/20/22	Weeks, Paul	1.0	811.75	Draft wrongful means section of motion to dismiss Defendants' counterclaims
05/20/22	Weeks, Paul	2.2	1,785.85	Draft litigation privilege section of motion to dismiss Defendants' counterclaims
05/20/22	Weeks, Paul	2.4	1,948.20	Draft background and standard of review sections of motion to dismiss Defendants' counterclaims
05/20/22	Weeks, Paul	1.1	892.93	Draft introduction to motion to dismiss Defendants' counterclaims
05/21/22	Michaelson, Andrew	2.4	2,815.20	Revise motion to dismiss counterclaims

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05/22/22	Harris, Laura	0.4	387.60	Communicate with team regarding defendants' revisions to draft case management plan
05/22/22	Harris, Laura	0.3	290.70	Review defendants' changes to case management plan
05/22/22	Roniger, Luke	0.2	166.60	Review and analyze defendants' latest proposals for draft Rule 26(f) Discovery Plan
05/22/22	Harris, Laura	1.8	1,744.20	Review case law relevant to motion to dismiss
05/23/22	Harris, Laura	0.7	678.30	Communicate with team regarding email to defendants requesting withdrawal of counterclaims
05/23/22	Harris, Laura	1.0	969.00	Participate in meeting with team regarding case strategy and preparation for meeting with defense counsel
05/23/22	Roniger, Luke	0.7	583.10	Meet with team regarding Rule 26(f) Discovery Plan and discovery preparation
05/23/22	Harris, Laura	2.3	2,228.70	Review and revise draft motion to dismiss counterclaims
05/23/22	Michaelson, Andrew	1.7	1,994.10	Review case law supporting motion to dismiss counterclaims
05/23/22	Weeks, Paul	1.6	1,298.80	Research additional case law regarding defenses to Defendants' counterclaims
05/23/22	Weeks, Paul	2.2	1,785.85	Revise brief in support of motion to dismiss Defendants' counterclaims based on comments received from team
05/23/22	Weeks, Paul	0.7	568.23	Communication regarding request to withdraw counterclaims
05/23/22	Roniger, Luke	0.5	416.50	Analyze discovery next steps and potential outreach to Defendants' counsel
05/23/22	Roniger, Luke	0.6	499.80	Revise correspondence to Defendants' counsel regarding settlement
05/24/22	Harris, Laura	0.3	290.70	Participate in call with L. Roniger regarding preparation for discovery
05/24/22	Harris, Laura	0.4	387.60	Communicate with I. Litvak regarding withdrawal of counterclaims
05/24/22	Harris, Laura	0.3	290.70	Participate in call with A. Michaelson regarding draft motion to dismiss brief
05/24/22	Michaelson, Andrew	0.4	469.20	Participate in telephone conference with P. Weeks regarding strategic approach to motion to dismiss
05/24/22	Michaelson, Andrew	1.3	1,524.90	Revise motion to dismiss counterclaims
05/24/22	Michaelson, Andrew	0.3	351.90	Participate in telephone conference with L. Harris regarding strategic approach to motion to dismiss
05/24/22	Michaelson, Andrew	0.4	469.20	Participate in telephone conference with M. Bush regarding strategic approach to motion to dismiss

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05/24/22	Sawant, Prachee	1.7	960.93	Legal research regarding motion to dismiss counterclaims
05/24/22	Weeks, Paul	0.5	405.88	Draft emails regarding defenses to Defendants' counterclaims
05/24/22	Weeks, Paul	0.4	324.70	Participate in call with A. Michaelson to discuss revisions to brief in support of motion to dismiss Defendants' counterclaims
05/24/22	Weeks, Paul	2.1	1,704.68	Revise brief in support of motion to dismiss Defendants' counterclaims based on comments from A. Michaelson
05/24/22	Roniger, Luke	0.4	333.20	Prepare for meeting with client regarding possible settlement options and discovery next steps
05/24/22	Harris, Laura	0.2	193.80	Communicate with team regarding I. Litvak correspondence
05/24/22	Roniger, Luke	0.3	249.90	Meet with L. Harris regarding response to I. Litvak and agenda for call with Google re possible settlement options and discovery next steps
05/25/22	Harris, Laura	0.8	775.20	Participate in call with client regarding case strategy and early discovery preparation
05/25/22	Harris, Laura	0.8	775.20	Communicate with I. Litvak regarding discovery plan revisions
05/25/22	Michaelson, Andrew	0.4	469.20	Analyze and revise case management submission
05/25/22	Roniger, Luke	0.6	499.80	Meet with client and team regarding next steps for potential settlement, outreach to Defendants' counsel, and discovery prep
05/25/22	Weeks, Paul	0.7	568.23	Provide suggested edits and comments regarding Defendants' proposed revisions to scheduling proposal and discovery plan
05/26/22	Roniger, Luke	0.3	249.90	Review and analyze I. Litvak proposed edits to Rule 26(f) Discovery Plan
05/26/22	Roniger, Luke	1.0	833.00	Meet with L. Harris, A. Michaelson, M. Bush, and P. Weeks regarding next steps for outreach to Litvak, edits to Rule 26(f) Discovery Plan, and proposed permanent injunction
05/26/22	Harris, Laura	0.6	581.40	Participate in meeting with L. Roniger and P. Weeks regarding preparation for initial pretrial conference
05/26/22	Roniger, Luke	0.8	666.40	Analyze permanent injunction options for outreach to Defendants' counsel
05/26/22	Harris, Laura	0.4	387.60	Communicate with I. Litvak regarding meet and confer
05/27/22	Roniger, Luke	0.7	583.10	Meet and confer with I. Litvak regarding potential settlement and edits to Rule 26(f) Discovery Plan
05/27/22	Roniger, Luke	0.5	416.50	Meet with M. Bush regarding next steps for outreach to I. Litvak for settlement and Rule 26(f) Discovery Plan
05/27/22	Weeks, Paul	0.3	243.53	Participate on meet and confer with Defendants' counsel regarding proposed case schedule and discovery plan
05/27/22	Weeks, Paul	0.5	405.88	Research deadline to file proposed case schedule and discovery plan in advance of initial pretrial conference with the court

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05/27/22	Harris, Laura	0.5	484.50	Participate in meet and confer with I. Litvak regarding potential settlement
05/27/22	Harris, Laura	1.4	1,356.60	Draft communication with I. Litvak regarding settlement framework
05/27/22	Harris, Laura	0.7	678.30	Communicate with client regarding meet and confer and litigation strategy
05/27/22	Michaelson, Andrew	0.4	469.20	Participate in settlement telephone conference with I. Litvak, L. Harris, S. Dantiki and L. Roniger
05/27/22	Michaelson, Andrew	0.2	234.60	Analyze potential settlement structure
05/27/22	Roniger, Luke	0.8	666.40	Draft and circulate proposed response to I. Litvak regarding potential settlement offer
05/28/22	Harris, Laura	0.4	387.60	Communicate with client concerning settlement strategy
05/28/22	Roniger, Luke	0.6	499.80	Revise and circulate proposed correspondence to I. Litvak regarding settlement offer and next steps for permanent injunction
05/30/22	Harris, Laura	0.4	387.60	Communicate with team concerning draft Rule 26(f) Report
05/30/22	Harris, Laura	0.7	678.30	Revise draft Rule 26(f) Report
05/30/22	Harris, Laura	0.4	387.60	Communicate with team concerning Litvak correspondence
05/31/22	Harris, Laura	0.9	872.10	Communicate with I. Litvak concerning draft Rule 26(f) Report
05/31/22	Harris, Laura	1.3	1,259.70	Review prior filings in preparation for initial pretrial conference
05/31/22	Harris, Laura	1.1	1,065.90	Prepare for initial pretrial conference
05/31/22	Harris, Laura	1.7	1,647.30	Communicate with team concerning Rule 26(f) Report
05/31/22	Harris, Laura	0.5	775.20	Participate in meet and confer with I. Litvak regarding pretrial scheduling order
05/31/22	Roniger, Luke	0.2	166.60	Review and compile redline and circulate revised Rule 26(f) Discovery Plan to Defense counsel
05/31/22	Roniger, Luke	0.5	416.50	Meet and confer with I. Litvak regarding edits to Rule 26(f) Discovery Plan
05/31/22	Roniger, Luke	0.4	333.20	Review and revise draft Rule 26(f) Discovery Plan with edits from L. Harris
05/31/22	Weeks, Paul	0.5	405.88	Participate in meet and confer with Defendants' counsel to discuss proposed revisions to case schedule and discovery plan
05/31/22	Weeks, Paul	1.1	892.93	Revise proposed case schedule and discovery plan to send to Defendants' counsel

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05/31/22	Weeks, Paul	0.8	649.40	Participate in call with internal team to discuss approach to proposed case schedule and discovery plan in light of proposed revisions from Defendants' counsel
05/31/22	Weeks, Paul	0.6	487.05	Revise proposed case schedule and discovery plan based on comments of Defendants' counsel in meet and confer
05/31/22	Sawant, Prachee	1.3	734.83	Revise draft motion to dismiss counterclaims
05/31/22	Sawant, Prachee	1.8	1,017.45	Legal research regarding motion to dismiss counterclaims
06/01/22	Harris, Laura	1.9	1,841.10	Attend initial pre-trial conference
06/01/22	Harris, Laura	0.6	581.40	Participate in meet and confer with defense counsel
06/01/22	Roniger, Luke	0.4	333.20	Analyze Defendants' proposed edits to Rule 26(f) Discovery Plan for purposes of the Initial Pretrial Conference
06/01/22	Roniger, Luke	0.3	249.90	Communication with client regarding revisions to Discovery Plan and settlement response from Defendants
06/01/22	Weeks, Paul	1.3	1,055.28	Draft analysis of legal research regarding the legality of conducting depositions in Russia and potential alternatives
06/01/22	Harris, Laura	0.5	484.50	Participate in call with A. Michaelson regarding preparation for hearing
06/01/22	Harris, Laura	2.4	2,325.60	Review relevant filings in preparation for scheduling conference
06/01/22	Harris, Laura	2.1	2,034.90	Review materials in preparation for initial pretrial conference
06/01/22	Meyer, Chris	1.9	1,366.80	Attend initial conference
06/01/22	Roniger, Luke	0.8	666.40	Prepare for Initial Pretrial Conference
06/01/22	Roniger, Luke	0.9	749.70	Review prep materials for Initial Pretrial Conference
06/01/22	Meyer, Chris	0.6	341.70	Attend meet and confer with opposing counsel regarding settlement
06/01/22	Michaelson, Andrew	0.4	469.20	Appear for settlement conference with I. Litvak, L. Harris and C. Meyer
06/02/22	Harris, Laura	1.9	1,841.10	Communicate with defense counsel regarding defendants' depositions
06/02/22	Harris, Laura	0.7	678.30	Review research regarding viability of depositions in Russia
06/02/22	Harris, Laura	0.6	581.40	Participate in call with team regarding preparation of submission to Court regarding defendants' depositions
06/02/22	Harris, Laura	2.4	2,325.60	Communicate with team regarding submission to Court regarding Defendants' depositions

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06/02/22	Michaelson, Andrew	1.5	1,759.50	Analyze issue of deposition location
06/02/22	Roniger, Luke	0.4	333.20	Meet with S. Dantiki and S. Hiers regarding response to I. Litvak counsel regarding location of Defendants' depositions
06/02/22	Roniger, Luke	0.8	666.40	Meet with L. Harris and A. Michaelson regarding submission to J. Cote for Defendants' depositions
06/02/22	Roniger, Luke	1.5	1,249.50	Research SDNY case law regarding location of party depositions
06/02/22	Roniger, Luke	2.3	1,915.90	Draft correspondence to J. Cote regarding proposed location for Defendants' depositions
06/02/22	Weeks, Paul	0.5	405.88	Draft emails to team with comments on strategy in light of Defendants' counsel's position on deposition location
06/02/22	Weeks, Paul	0.8	649.40	Participate in call with A. Michaelson, L. Harris, and L. Roniger to discuss draft letter to the court regarding Defendants' deposition location
06/03/22	Harris, Laura	0.5	484.50	Participate in call with team regarding letter to Court concerning defendants' depositions
06/03/22	Harris, Laura	1.1	1,065.90	Review defendants' submissions to Court and Court Order
06/03/22	Harris, Laura	2.3	2,228.70	Revise letter to Court regarding defendants' depositions
06/03/22	Harris, Laura	2.4	2,325.60	Revise submission to Court regarding defendants' depositions
06/03/22	Meyer, Chris	0.6	341.70	Participate in internal team meeting regarding I. Litvak letter and motions with respect to discovery
06/03/22	Michaelson, Andrew	0.4	469.20	Revise letter to court regarding depositions
06/03/22	Michaelson, Andrew	1.3	1,524.90	Revise letter to court regarding depositions
06/03/22	Roniger, Luke	0.5	416.50	Finalize submission to Court regarding location of Defendants' depositions
06/03/22	Roniger, Luke	0.6	499.80	Revise letter to J. Cote regarding location of Defendants' depositions
06/03/22	Weeks, Paul	0.6	487.05	Participate in team call to discuss draft letter to the court regarding the location for defendants' depositions and related strategy considerations
06/03/22	Roniger, Luke	0.4	333.20	Meet with C. Meyer regarding exhibits for submission to Court
06/06/22	Michaelson, Andrew	0.2	234.60	Analyze issue regarding location of deposition of defendants
06/06/22	Roniger, Luke	0.4	333.20	Review draft discovery requests to defendants
06/06/22	Harris, Laura	0.4	387.60	Review research regarding sanctions

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06/07/22	Weeks, Paul	0.7	568.23	Conduct legal research regarding potential sanctions based on Defendants' and their counsel's litigation conduct
06/09/22	Harris, Laura	0.6	581.40	Communicate with client concerning court's ruling regarding deposition location
06/09/22	Harris, Laura	0.3	290.70	Communicate with German counsel regarding potential deposition locations
06/09/22	Harris, Laura	0.8	775.20	Review Court's ruling regarding deposition location
06/09/22	Harris, Laura	0.7	678.30	Review research regarding potential deposition location
06/09/22	Harris, Laura	1.0	969.00	Analyze issue of deposition location
06/09/22	Michaelson, Andrew	0.2	234.60	Analyze issue of locations for depositions
06/09/22	Sawant, Prachee	1.1	621.78	Research regarding accessible deposition locations in Middle-East and Asia for Russian citizens
06/09/22	Sawant, Prachee	1.2	678.30	Research regarding international deposition laws
06/09/22	Sawant, Prachee	1.2	678.30	Research regarding potential deposition locations in Europe for Russian citizen
06/09/22	Weeks, Paul	0.5	405.88	Participate in call with L. Harris to discuss potential response to court's order regarding defendants' deposition location and potential motions to file with the court seeking sanctions or other relief
06/10/22	Harris, Laura	1.0	969.00	Participate in call with German counsel regarding deposition location
06/10/22	Harris, Laura	0.8	775.20	Analyze letter to the Court regarding potential deposition locations
06/10/22	Harris, Laura	1.1	1,065.90	Communicate with team regarding potential deposition location
06/10/22	Harris, Laura	0.6	581.40	Review research regarding potential deposition location
06/10/22	Michaelson, Andrew	0.5	586.50	Revise submission concerning deposition locations
06/10/22	Weeks, Paul	0.8	649.40	Participate in call with L. Roniger to discuss draft letter with proposed deposition locations and next steps following court's order
06/10/22	Weeks, Paul	0.3	243.53	Draft letter to the court with proposed deposition locations
06/13/22	Harris, Laura	0.4	387.60	Communicate with client concerning botnet activity and sanctions motion options
06/14/22	Harris, Laura	0.6	581.40	Review defendants' letter concerning deposition
06/14/22	Michaelson, Andrew	0.5	586.50	Analyze I. Litvak submission concerning depositions

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06/14/22	Weeks, Paul	0.2	162.35	Participate in call with L. Roniger to discuss defendants' submission re deposition location and proposed next steps
06/14/22	Weeks, Paul	0.5	405.88	Analyze Defendants' submission regarding deposition location
06/17/22	Michaelson, Andrew	0.3	351.90	Review and analyze initial disclosures
06/20/22	Weeks, Paul	0.2	162.35	Review contact information in Defendants' initial disclosures
06/21/22	Harris, Laura	1.0	969.00	Participate in team meeting regarding initial disclosures
06/21/22	Roniger, Luke	1.0	833.00	Meet with K&S team regarding next steps for discovery requests and correspondence with J. Cote and I. Litvak
06/21/22	Roniger, Luke	2.3	1,915.90	Review research regarding a party's initial disclosure obligations in relation to Defendants' deficient initial disclosure
06/21/22	Sawant, Prachee	0.6	339.15	Review Defendants' initial disclosures and related communications
06/21/22	Sawant, Prachee	0.4	226.10	Draft letter response to defendants' initial disclosures
06/21/22	Sawant, Prachee	0.4	226.10	Communicate with L. Roniger regarding response letter to initial disclosures
06/21/22	Sawant, Prachee	2.4	1,356.60	Draft letter response to defendants' initial disclosures
06/21/22	Sawant, Prachee	1.0	565.25	Confer with L. Roniger regarding defendants' initial disclosures
06/21/22	Sawant, Prachee	1.5	847.88	Research regarding sanctions for defendants' incomplete initial disclosures
06/21/22	Sawant, Prachee	1.4	791.35	Legal research regarding initial disclosure requirements
06/22/22	Michaelson, Andrew	0.4	469.20	Analyze Defendants' motion for reciprocal discovery
06/22/22	Michaelson, Andrew	0.7	821.10	Revise letter to I. Litvak regarding inadequacies of initial disclosures
06/22/22	Roniger, Luke	0.2	166.60	Meet with S. Dantiki regarding edits to letter for Defendants' deficient initial disclosures
06/22/22	Roniger, Luke	1.9	1,582.70	Draft correspondence to I. Litvak regarding deficient initial disclosures
06/22/22	Roniger, Luke	0.6	499.80	Revise draft correspondence to I. Litvak regarding Defendants' deficient initial disclosure with edits from A. Michaelson and L. Harris
06/22/22	Roniger, Luke	1.1	916.30	Review SDNY case law regarding initial disclosure obligations in relation to Defendants' deficient initial disclosure
06/22/22	Sawant, Prachee	0.8	452.20	Review defendants' discovery related motions

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06/22/22	Sawant, Prachee	0.5	282.63	Review edits to draft letter regarding initial disclosures
06/22/22	Sawant, Prachee	0.7	395.68	Review defendants' response letter regarding discovery
06/22/22	Sawant, Prachee	1.1	621.78	Revise draft letter regarding initial disclosures
06/22/22	Sawant, Prachee	0.4	226.10	Incorporate L. Harris edits to draft letter regarding initial disclosures
06/23/22	Harris, Laura	0.8	775.20	Revise letter to Defendants regarding initial disclosures
06/23/22	Harris, Laura	1.0	969.00	Revise letter to court regarding defendants' request for discovery stay
06/23/22	Michaelson, Andrew	1.0	1,173.00	Revise letter to Court regarding Defendants' request for reciprocal stay
06/23/22	Roniger, Luke	0.3	249.90	Finalize correspondence to I. Litvak re Defendants' Initial Disclosures
06/23/22	Roniger, Luke	0.6	499.80	Revise correspondence to I. Litvak regarding deficient initial disclosures with edits from L. Harris
06/23/22	Sawant, Prachee	0.4	226.10	Review and edit letter to opposing counsel regarding discovery
06/23/22	Weeks, Paul	0.3	243.53	Review draft letter responding to Defendants' letter to the court requesting stay of discovery as to Defendants
06/26/22	Roniger, Luke	0.4	333.20	Research SDNY Rule 33 and scope of initial interrogatories
06/26/22	Roniger, Luke	1.1	916.30	Revise draft Google's Interrogatories to Defendants Starovikov and Filippov
06/26/22	Roniger, Luke	0.6	499.80	Revise Google's Requests for Production to Defendants Starovikov and Filippov
06/27/22	Harris, Laura	0.5	484.50	Participate in meet and confer with opposing counsel and preparation for same
06/27/22	Harris, Laura	0.2	193.80	Communicate with team concerning defendants' amended initial disclosures
06/27/22	Harris, Laura	0.5	484.50	Review defendants' amended initial disclosures
06/27/22	Harris, Laura	0.4	387.60	Communicate with team concerning follow-up with defendants' counsel
06/27/22	Harris, Laura	0.7	678.30	Participate in team meeting concerning initial disclosures and draft discovery requests
06/27/22	Meyer, Chris	1.6	911.20	Research discovery issue regarding control of devices
06/27/22	Michaelson, Andrew	0.5	586.50	Participate in meet-and-confer with I. Litvak, L. Harris and S. Dantiki regarding initial disclosures

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06/27/22	Roniger, Luke	0.9	749.70	Review SDNY research regarding Rule 26 obligations and "possession, custody, and control" with respect to Defendants' devices for discovery
06/27/22	Roniger, Luke	1.1	916.30	Draft correspondence to I. Litvak regarding deficient initial disclosures and Rule 26 obligations
06/27/22	Roniger, Luke	0.4	333.20	Meet and confer with I. Litvak regarding deficient initial disclosures
06/27/22	Roniger, Luke	0.8	666.40	Meet with K&S team regarding correspondence to I. Litvak and next steps for discovery requests
06/27/22	Sawant, Prachee	0.3	169.58	Communicate with C. Meyers regarding initial disclosure research
06/27/22	Sawant, Prachee	1.1	621.78	Legal research regarding initial disclosures
06/27/22	Sawant, Prachee	1.7	960.93	Legal research regarding documents in possession of employer for discovery
06/27/22	Sawant, Prachee	1.3	734.83	Draft summary of research regarding initial disclosures and document discovery
06/28/22	Harris, Laura	0.6	581.40	Review case law concerning control for purposes of discovery obligations
06/28/22	Meyer, Chris	1.5	854.25	Research discovery issue regarding control of devices
06/28/22	Michaelson, Andrew	0.7	821.10	Analyze revised initial disclosures
06/29/22	Roniger, Luke	0.9	749.70	Revise draft requests for production
06/30/22	Meyer, Chris	2.1	1,195.95	Research discovery issue regarding defendants' control of devices
06/30/22	Roniger, Luke	1.1	916.30	Revise draft requests for production and Interrogatories
06/30/22	Sawant, Prachee	2.4	1,356.60	Review initial discovery requests to defendant
07/01/22	Harris, Laura	0.6	581.40	Review draft interrogatories and requests for production
07/01/22	Meyer, Chris	0.5	284.75	Draft summary of discovery research regarding production of devices
07/01/22	Meyer, Chris	2.4	1,366.80	Conduct legal research regarding control issue for production of devices by defendants
07/02/22	Harris, Laura	0.8	775.20	Draft communication to defendants' counsel concerning initial disclosures
07/02/22	Harris, Laura	2.3	2,228.70	Revise draft requests for production and inspection
07/02/22	Harris, Laura	2.4	2,325.60	Revise draft interrogatories

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07/04/22	Michaelson, Andrew	2.0	2,346.00	Revise draft discovery requests
07/04/22	Michaelson, Andrew	0.6	703.80	Analyze strategy with respect to sanctions
07/05/22	Harris, Laura	1.0	969.00	Participate in team meeting regarding defendants' initial disclosures and motion practice concerning same
07/05/22	Roniger, Luke	0.7	583.10	Revise Interrogatories with edits from S. Dantiki, L. Harris, and A. Michaelson
07/05/22	Roniger, Luke	0.9	749.70	Revise Requests for Production with edits from S. Dantiki, L. Harris, and A. Michaelson
07/05/22	Roniger, Luke	0.9	749.70	Communicate with team regarding next steps for motion to compel, RFPs, interrogatories
07/05/22	Roniger, Luke	0.8	666.40	Meet with K&S team regarding next steps for discovery requests and possible motion to compel as to Defendants' initial disclosures
07/05/22	Sawant, Prachee	1.7	960.93	Finalize discovery requests to defendant
07/05/22	Sawant, Prachee	0.3	169.58	Meet L. Roniger, M. Bush, and S. Hiers regarding discovery requests to defendant
07/05/22	Sawant, Prachee	2.0	1,130.50	Edit requests for production
07/05/22	Sawant, Prachee	1.7	960.93	Edit interrogatories
07/06/22	Roniger, Luke	0.2	166.60	Meet with P. Weeks regarding next steps for discovery requests
07/06/22	Roniger, Luke	1.2	999.60	Revise draft discovery requests
07/06/22	Weeks, Paul	0.2	162.35	Participate in call with L. Roniger to discuss upcoming discovery
07/06/22	Weeks, Paul	0.5	405.88	Review draft discovery requests and correspondence to Defendants
07/08/22	Harris, Laura	0.6	581.40	Communicate with team concerning discovery strategy
07/08/22	Roniger, Luke	0.2	166.60	Meet with S. Dantiki regarding next steps for discovery requests
07/11/22	Michaelson, Andrew	1.0	1,173.00	Review revised draft discovery requests
07/11/22	Roniger, Luke	0.3	249.90	Edits to requests for production, interrogatories
07/11/22	Roniger, Luke	0.8	666.40	Meet with team regarding response to Defendants' counsel for deficient initial disclosures
07/11/22	Roniger, Luke	0.3	249.90	Draft agenda for team meeting

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07/13/22	Harris, Laura	0.4	387.60	Communicate with team regarding draft motion to compel
07/14/22	Harris, Laura	0.8	775.20	Revise draft motion to compel
07/14/22	Harris, Laura	0.4	387.60	Communicate with team concerning draft motion to compel
07/14/22	Weeks, Paul	2.3	1,867.03	Draft discovery letter-motion regarding defendants' initial disclosures
07/14/22	Weeks, Paul	2.2	1,785.85	Research court rules and supporting case law for discovery letter-motion regarding defendants' initial disclosures
07/15/22	Harris, Laura	1.2	1,162.80	Revise draft motion to compel
07/15/22	Weeks, Paul	0.3	243.53	Review and revise letter-motion regarding defendants' initial disclosures
07/18/22	Harris, Laura	0.8	775.20	Communicate with I. Litvak regarding initial disclosures
07/18/22	Michaelson, Andrew	0.4	469.20	Attention to status of discovery-related court filings
07/18/22	Roniger, Luke	0.5	416.50	Meet with team regarding next steps for RFPs, interrogatories
07/18/22	Weeks, Paul	0.3	243.53	Review edits and comments to letter-motion to the court regarding defendants' initial disclosures
07/19/22	Harris, Laura	0.4	387.60	Communicate with P. Weeks regarding draft motion to compel
07/19/22	Michaelson, Andrew	0.4	469.20	Attention to Litvak email regarding computer devices
07/19/22	Roniger, Luke	0.2	166.60	Serve Google's First RFPs and Interrogatories
07/19/22	Roniger, Luke	1.0	833.00	Revise Requests for Production and Interrogatories with edits from team
07/19/22	Roniger, Luke	0.5	416.50	Meet with M. Bush regarding edits to Requests for Production, Interrogatories, and final steps for filing/serving
07/19/22	Roniger, Luke	0.6	499.80	Meet with L. Harris, M. Bush, and team regarding final edits to Requests for Production, Interrogatories
07/19/22	Roniger, Luke	0.2	166.60	Meet with S. Hiers regarding edits to Google's Requests for Production and Interrogatories
07/19/22	Sawant, Prachee	1.5	847.88	Revise discovery requests to defendants
07/19/22	Weeks, Paul	2.2	1,785.85	Revise letter-motion to the court regarding defendants' initial disclosures in light of comments received and additional communications from defense counsel
07/19/22	Weeks, Paul	0.6	487.05	Participate in call with L. Harris, M. Bush, L. Roniger and P. Sawant to discuss filings with the court and discovery to be served on defendants

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07/20/22	Roniger, Luke	0.5	416.50	Meet with P. Weeks regarding next steps for discovery requests
07/25/22	Harris, Laura	1.0	969.00	Participate in call with team regarding hearing preparation
07/25/22	Roniger, Luke	0.5	416.50	Meet with team regarding hearing prep and next round of discovery requests.
07/25/22	Weeks, Paul	1.0	811.75	Review and analyze Defendants' response letter regarding discovery dispute
07/25/22	Harris, Laura	0.8	775.20	Participate in call with team regarding hearing strategy
07/25/22	Weeks, Paul	1.5	1,217.63	Draft summary of requirements and submission for upcoming settlement conference
07/26/22	Harris, Laura	0.7	678.30	Communicate with team concerning Defendants' letter to Court
07/26/22	Harris, Laura	0.5	484.50	Review Defendants' letter to the Court
07/26/22	Michaelson, Andrew	0.4	469.20	Analyze inadequacy of discovery responses
07/26/22	Roniger, Luke	0.5	416.50	Meet with P. Weeks and P. Sawant regarding prep for 7/29 hearing
07/26/22	Sawant, Prachee	1.8	1,017.45	Legal research regarding duty to preserve and produce documents
07/26/22	Weeks, Paul	0.5	405.88	Prepare for upcoming discovery conference with the court regarding Defendants' initial disclosures
07/27/22	Sawant, Prachee	1.4	791.35	Draft memorandum on research regarding spoliation of documents and related sanctions
07/27/22	Sawant, Prachee	1.8	1,017.45	Legal research regarding spoliation
07/27/22	Weeks, Paul	0.7	568.23	Draft email with analysis on how to respond to Defendants' request to adjourn upcoming settlement conference
07/28/22	Weeks, Paul	2.1	1,704.68	Conduct legal research regarding arguments to compel the production of devices despite their being purportedly returned to Valtron
07/28/22	Weeks, Paul	2.4	1,948.20	Prepare for discovery conference before Judge Cote regarding Defendants' initial disclosures
07/28/22	Weeks, Paul	1.8	1,461.15	Conduct legal research regarding arguments to sanction counsel for failure to comply with duties to ensure the preservation of evidence accessible to Defendants
07/29/22	Harris, Laura	0.8	775.20	Communicate with team concerning questions for defendants and opposing counsel
07/29/22	Harris, Laura	2.4	2,325.60	Prepare for discovery conference
07/29/22	Harris, Laura	0.7	678.30	Participate in call with team regarding discovery conference strategy

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07/29/22	Harris, Laura	0.8	775.20	Appear at conference concerning discovery motion
07/29/22	Roniger, Luke	0.5	416.50	Confer with team regarding hearing with J. Cotere regarding deficiencies in Defendants' initial disclosures
07/29/22	Sawant, Prachee	0.4	226.10	Review discovery conference transcript
07/29/22	Sawant, Prachee	0.9	508.73	Draft summary of discovery requests regarding devices
07/29/22	Weeks, Paul	0.7	568.23	Participate in call with internal team regarding discovery conference with the court regarding defendants' initial disclosures and devices
07/29/22	Harris, Laura	0.8	775.20	Review research concerning terminating sanctions and attorney sanctions
07/29/22	Sawant, Prachee	0.4	226.10	Research cases regarding discovery sanctions
07/29/22	Weeks, Paul	2.0	1,623.50	Conduct legal research regarding the sanction of an adverse inference in connection with the spoliation of discovery
07/30/22	Meyer, Chris	1.0	569.50	Conduct legal research regarding sanctions
07/31/22	Harris, Laura	1.4	1,356.60	Review defendants' statements regarding Valtron
07/31/22	Harris, Laura	1.5	1,453.50	Revise questions for defendants and Litvak
07/31/22	Michaelson, Andrew	0.5	586.50	Analyze questions for Litvak
07/31/22	Weeks, Paul	1.4	1,136.45	Draft discovery questions to defendants and their counsel per the court's order
07/31/22	Weeks, Paul	1.5	1,217.63	Draft comprehensive overview of negotiations with counsel regarding devices in connection with the joint Rule 26(f) report in light of counsel's representation at the discovery conference with the court
08/01/22	Harris, Laura	0.8	775.20	Revisions to draft questions to Litvak and defendants
08/01/22	Harris, Laura	1.0	969.00	Participate in team call concerning requests to defendants and Litvak
08/01/22	Harris, Laura	0.5	484.50	Revisions to draft requests to defendants and Litvak
08/01/22	Michaelson, Andrew	1.5	1,759.50	Analyze questions for Litvak and defendants
08/01/22	Roniger, Luke	0.7	583.10	Meet with M. Bush, P. Weeks, and associates regarding next steps for discovery questions for Defendants and related research
08/01/22	Roniger, Luke	1.1	916.30	Meet with team regarding questions for Defendants and opposing counsel and discovery requests
08/01/22	Weeks, Paul	0.6	487.05	Participate in call with M. Bush, L. Roniger, P. Sawant, C. Meyer, and S. Hiers to discuss draft discovery questions to defendants and their counsel per the court's order

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08/01/22	Weeks, Paul	2.3	1,867.03	Revise draft discovery questions to defendants and their counsel per the court's order
08/02/22	Sawant, Prachee	0.2	113.05	Analyze discovery requests
08/03/22	Sawant, Prachee	0.9	508.73	Analyze correspondence with court regarding defense counsel conduct
08/06/22	Harris, Laura	0.7	678.30	Review research concerning discovery sanctions
08/08/22	Harris, Laura	0.7	678.30	Review defendants' and Litvak's responses to discovery questions
08/08/22	Michaelson, Andrew	1.3	1,524.90	Analyze Litvak response to discovery questions
08/08/22	Roniger, Luke	0.4	333.20	Meet with P. Weeks regarding next steps for discovery and hearing preparation
08/08/22	Roniger, Luke	0.4	333.20	Meet with L. Harris regarding next steps for hearing preparation, discovery
08/09/22	Harris, Laura	0.8	775.20	Communicate with client concerning Defendants' responses to discovery questions
08/09/22	Harris, Laura	0.7	678.30	Meet with team regarding discovery responses
08/09/22	Harris, Laura	1.4	1,356.60	Communicate with team concerning discovery responses
08/09/22	Roniger, Luke	1.8	1,499.40	Meet with L. Harris, M. Bush, P. Weeks, and S. Hiers regarding response to Litvak correspondence and corresponding research needs
08/09/22	Weeks, Paul	2.4	1,948.20	Draft discovery letter to the court regarding defendants' and Litvak's deficient responses to discovery questions
08/09/22	Weeks, Paul	0.5	405.88	Participate in call with L. Harris, M. Bush, L. Roniger, and S. Hiers to discuss defendants' and Litvak's responses to discovery questions
08/09/22	Weeks, Paul	2.3	1,867.03	Draft time line of defendants' and Litvak's representation throughout the litigation as a potential appendix to discovery letter regarding deficient responses to discovery questions
08/10/22	Harris, Laura	0.8	775.20	Revise draft letter to the Court
08/10/22	Roniger, Luke	0.6	499.80	Review evidence regarding Defendants' connection to Enterprise-affiliated entities for letter response regarding discovery
08/10/22	Roniger, Luke	0.1	83.30	Meet with S. Hiers regarding letter response regarding discovery
08/10/22	Roniger, Luke	0.6	499.80	Revise documents for discovery conference preparation
08/10/22	Roniger, Luke	0.5	416.50	Review documents for discovery conference preparation
08/10/22	Roniger, Luke	1.1	916.30	Revise letter to Court regarding Defendants' discovery deficiencies

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08/10/22	Roniger, Luke	0.8	666.40	Meet with L. Harris and team regarding next steps for Reply brief and response letter regarding Defendants' discovery deficiencies
08/10/22	Weeks, Paul	0.8	649.40	Participate in call with L. Harris, M. Bush, L. Roniger, and S. Hiers to discuss letter to the court in light of defendants' and Litvak's responses to discovery questions
08/10/22	Weeks, Paul	2.4	1,948.20	Review defendants' and Litvak's representations regarding discovery throughout litigation for discovery correspondence to Court
08/10/22	Weeks, Paul	2.4	1,948.20	Revise discovery letter to the court regarding defendants' and Litvak's deficient responses to discovery questions in light of two-page limit
08/10/22	Weeks, Paul	2.4	1,948.20	Draft discovery letter to the court regarding defendants' and Litvak's deficient responses to discovery questions
08/10/22	Sawant, Prachee	1.4	791.35	Draft preparatory documents for oral argument regarding discovery
08/10/22	Sawant, Prachee	1.4	791.35	Analyze discovery materials
08/10/22	Weeks, Paul	2.4	1,948.20	Research potential discovery bases for sanctions against defendants and Litvak in light of misrepresentations and deficient discovery
08/11/22	Harris, Laura	2.4	2,325.60	Revise draft letter to the Court
08/11/22	Harris, Laura	2.3	2,228.70	Review previous filings, transcripts, and other exhibits in connection with revising draft letter to Court
08/11/22	Meyer, Chris	0.5	284.75	Meet with L. Roniger, P. Weeks regarding preparation for upcoming court hearing regarding discovery and sanctions
08/11/22	Roniger, Luke	0.9	749.70	Revise letter regarding discovery to J. Cote for filing
08/11/22	Roniger, Luke	0.5	416.50	Meet with L. Harris regarding edits to letter to J. Cote and prep for August 12 discovery conference
08/11/22	Roniger, Luke	0.4	333.20	Finalize exhibits for letter to J. Cote regarding Defendants' discovery deficiencies and responses to Google's questions
08/11/22	Roniger, Luke	0.6	499.80	Revise letter to J. Cote regarding Defendants' discovery deficiencies with additional edits from L. Harris and client
08/11/22	Roniger, Luke	0.6	499.80	Meet with P. Weeks and C. Meyer regarding prep materials and talking points for discovery hearing
08/11/22	Weeks, Paul	1.9	1,542.33	Provide edits and comments to revised letter to the court regarding defendants' and Litvak's responses to discovery questions
08/11/22	Weeks, Paul	0.7	568.23	Participate in calls with L. Roniger and C. Meyer to discuss prep for discovery conference with the court
08/11/22	Weeks, Paul	0.5	405.88	Participate in call with L. Harris, M. Bush, and L. Roniger to discuss revised letter to the court regarding defendants' and Litvak's responses to discovery questions
08/11/22	Roniger, Luke	0.4	333.20	Review and circulate call notes and related documents for letter to J. Cote regarding Defendants' misrepresentations
08/11/22	Sawant, Prachee	0.8	452.20	Edit preparatory documents for oral argument regarding discovery

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08/11/22	Sawant, Prachee	0.8	452.20	Edit preparatory documents for oral arguments regarding discovery
08/11/22	Meyer, Chris	2.1	1,195.95	Research caselaw regarding sanctions award pursuant to court inherent authority
08/11/22	Meyer, Chris	2.3	1,309.85	Research caselaw regarding sanctions award pursuant to Rule 26
08/11/22	Meyer, Chris	2.3	1,309.85	Research caselaw regarding sanctions award pursuant to Rule 37
08/11/22	Michaelson, Andrew	0.3	351.90	Analyze letter motion for sanctions
08/11/22	Michaelson, Andrew	0.6	703.80	Revise letter request for sanctions
08/12/22	Meyer, Chris	2.1	1,195.95	Draft hearing prep materials for upcoming court conference regarding sanctions research
08/12/22	Roniger, Luke	1.5	1,249.50	Review case law for J. Cote discovery conference
08/12/22	Roniger, Luke	0.8	666.40	Preparation for discovery conference with the court
08/12/22	Roniger, Luke	1.5	1,249.50	Meet with C. Meyer regarding preparation and research for discovery conference
08/12/22	Weeks, Paul	1.9	1,542.33	Preparation for discovery conference with the court
08/12/22	Weeks, Paul	1.2	974.10	Participate in calls with M. Bush and L. Roniger to discuss prep for discovery conference with the court
08/12/22	Weeks, Paul	0.7	568.23	Participate in team call to discuss strategy in advance of discovery conference with the court
08/12/22	Weeks, Paul	0.8	649.40	Review Defendants' letter to the court in advance of discovery conference
08/12/22	Weeks, Paul	0.2	162.35	Attend discovery conference with the court
08/12/22	Weeks, Paul	1.2	974.10	Annotate time line of changes Litvak proposed for Rule 26(f) report in preparation for discovery conference with the court
08/12/22	Harris, Laura	1.6	1,550.40	Communicate with team concerning motion for terminating sanctions and court-ordered briefing schedule
08/12/22	Harris, Laura	0.7	678.30	Review research concerning motion for sanctions
08/12/22	Harris, Laura	0.6	581.40	Communicate with client concerning court-ordered briefing schedule for sanctions motion
08/12/22	Harris, Laura	2.4	2,325.60	Prepare for discovery hearing concerning sanctions motion
08/12/22	Harris, Laura	1.4	1,356.60	Communicate with team concerning preparation for hearing regarding sanctions motion

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08/12/22	Meyer, Chris	2.2	1,252.90	Research caselaw regarding sanctions award pursuant to Rule 37
08/12/22	Weeks, Paul	0.1	81.18	Participate on team call following discovery conference with the court to discuss sanctions motion and next steps
08/13/22	Weeks, Paul	0.9	730.58	Review draft background section to motion for sanctions
08/14/22	Weeks, Paul	1.9	1,542.33	Research case law regarding potential sanctions under Rule 26(g) in support of motion for sanctions against defendants and Litvak
08/14/22	Weeks, Paul	1.8	1,461.15	Research case law regarding potential sanctions under inherent authority in support of motion for sanctions against defendants and Litvak
08/14/22	Weeks, Paul	1.8	1,461.15	Research case law regarding potential sanctions under Rule 37(b) in support of motion for sanctions against defendants and Litvak
08/15/22	Meyer, Chris	0.5	284.75	Draft correspondence to Court regarding service of courtesy copies
08/15/22	Weeks, Paul	0.3	243.53	Revise cover letter to the court for submission of courtesy copies
08/15/22	Harris, Laura	1.0	969.00	Participate in call with team regarding draft motion for sanctions
08/15/22	Michaelson, Andrew	0.8	938.40	Participate in team call regarding strategy for sanctions motion
08/15/22	Sawant, Prachee	2.1	1,187.03	Review exhibits for sanctions draft
08/15/22	Weeks, Paul	0.4	324.70	Draft email to P. Sawant with projects to support motion for sanctions
08/15/22	Weeks, Paul	1.1	892.93	Research case law regarding potential sanctions under Rule 37(e) in support of motion for sanctions against defendants and Litvak
08/16/22	Meyer, Chris	0.4	227.80	Revise letter to Court regarding courtesy copies
08/16/22	Sawant, Prachee	1.6	904.40	Edit citations in sanctions motion
08/16/22	Sawant, Prachee	1.8	1,017.45	Review corresponding exhibits for sanctions motion
08/16/22	Weeks, Paul	2.1	1,704.68	Research case law regarding potential sanctions under Rule 37(e) in support of motion for sanctions against defendants and Litvak
08/16/22	Weeks, Paul	2.1	1,704.68	Draft standard of review section for brief in support of motion for sanctions against defendants and Litvak
08/16/22	Weeks, Paul	2.0	1,623.50	Research case law regarding potential sanctions under Rule 37(f) in support of motion for sanctions against defendants and Litvak
08/16/22	Weeks, Paul	2.4	1,948.20	Draft argument section for terminating sanctions for failure to obey discovery order under Rule 37(b) in brief in support of motion for sanctions against defendants and Litvak
08/16/22	Weeks, Paul	1.7	1,379.98	Research case law regarding potential sanctions under Rule 37(c) in support of motion for sanctions against defendants and Litvak

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08/17/22	Harris, Laura	0.4	387.60	Review draft motion for sanctions
08/17/22	Meyer, Chris	0.4	227.80	Revise motion for sanctions
08/17/22	Weeks, Paul	2.3	1,867.03	Draft argument section for terminating sanctions for failure to obey discovery order under Rule 37(b) in brief in support of motion for sanctions against defendants and Litvak
08/17/22	Weeks, Paul	2.2	1,785.85	Revise draft standard of review section of brief in support of motion for sanctions
08/17/22	Weeks, Paul	2.2	1,785.85	Draft argument section for monetary sanctions and attorney's fees in brief in support of motion for sanctions against defendants and Litvak
08/17/22	Weeks, Paul	2.4	1,948.20	Revise draft argument section in brief in support of motion for sanctions
08/17/22	Weeks, Paul	2.4	1,948.20	Draft argument section for terminating sanctions for spoliation under Rule 37(e) in brief in support of motion for sanctions against defendants and Litvak
08/18/22	Harris, Laura	0.4	387.60	Participate in call with Andrew Michaelson regarding motion for sanctions
08/18/22	Harris, Laura	1.2	1,162.80	Communicate with P. Weeks and M. Bush regarding revising draft motion for sanctions
08/18/22	Harris, Laura	2.4	2,325.60	Revise draft motion for sanctions
08/18/22	Harris, Laura	1.0	969.00	Participate in call with team regarding draft motion for sanctions
08/18/22	Harris, Laura	2.3	2,228.70	Review cases cited in draft motion for sanctions
08/18/22	Meyer, Chris	2.3	1,309.85	Revise motion for sanctions
08/18/22	Michaelson, Andrew	0.2	234.60	Participate in teleconference with L. Harris regarding motion for sanctions
08/18/22	Michaelson, Andrew	2.3	2,697.90	Revise draft motion for sanctions based on draft by M. Bush and P. Weeks
08/18/22	Michaelson, Andrew	0.8	938.40	Participate in teleconferences with L. Harris and P. Weeks regarding edits to motion for sanctions
08/18/22	Sawant, Prachee	1.6	904.40	Review caselaw in sanctions motion
08/18/22	Sawant, Prachee	2.4	1,356.60	Draft analysis of caselaw granting terminating sanctions for purposes of sanctions motion
08/18/22	Sawant, Prachee	0.8	452.20	Draft analysis of basis for sanctions for purposes of sanctions motion
08/18/22	Weeks, Paul	2.4	1,948.20	Draft revised background section of brief in support of motion for sanctions
08/18/22	Weeks, Paul	1.7	1,379.98	Revise argument section for monetary sanctions and attorney's fees in brief in support of motion for sanctions against defendants and Litvak

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08/18/22	Weeks, Paul	2.0	1,623.50	Revise argument section for terminating sanctions for spoliation under Rule 37(e) in brief in support of motion for sanctions against defendants and Litvak
08/18/22	Weeks, Paul	2.4	1,948.20	Draft preliminary statement of brief in support of motion for sanctions against defendants and Litvak
08/18/22	Weeks, Paul	1.6	1,298.80	Participate in calls with L. Harris and M. Bush to discuss revisions to brief in support of motion for sanctions
08/18/22	Weeks, Paul	0.3	243.53	Participate in call with A. Michaelson to discuss revisions to background section of brief in support of motion for sanctions
08/18/22	Weeks, Paul	1.5	1,217.63	Revise argument section for terminating sanctions for failure to obey discovery order under Rule 37(b) in brief in support of motion for sanctions against defendants and Litvak
08/19/22	Harris, Laura	0.6	581.40	Communicate with client concerning draft motion for sanctions
08/19/22	Harris, Laura	1.3	1,259.70	Revise draft motion for sanctions
08/19/22	Meyer, Chris	0.7	398.65	Review draft motion for sanctions
08/19/22	Michaelson, Andrew	2.3	2,697.90	Revise motion for sanctions
08/19/22	Sawant, Prachee	1.8	1,017.45	Review citations/exhibits for sanctions motion
08/19/22	Weeks, Paul	2.4	1,948.20	Draft argument section identifying sanctionable conduct by defendants and Litvak
08/19/22	Weeks, Paul	2.1	1,704.68	Implement further edits and comments received to draft brief in support of motion for sanctions
08/19/22	Weeks, Paul	2.3	1,867.03	Revise argument structure in brief in support of motion for sanctions against defendants and Litvak
08/19/22	Weeks, Paul	2.0	1,623.50	Revise draft brief in support of motion for sanctions against defendants and Litvak
08/19/22	Weeks, Paul	1.7	1,379.98	Revise argument section for terminating sanctions for failure to obey discovery order under Rule 37(b) in brief in support of motion for sanctions against defendants and Litvak
08/20/22	Michaelson, Andrew	0.5	586.50	Analyze motion for sanctions
08/21/22	Meyer, Chris	2.0	1,139.00	Draft ancillary documents to motion for sanctions
08/22/22	Harris, Laura	0.7	678.30	Communicate with P. Weeks regarding motion for sanctions
08/22/22	Harris, Laura	2.3	2,228.70	Finalize draft materials for motion for sanctions
08/22/22	Meyer, Chris	1.6	911.20	Draft ancillary documents to motion for sanctions
08/22/22	Meyer, Chris	2.0	1,139.00	Draft proposed sanctions order

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08/22/22	Michaelson, Andrew	2.4	2,815.20	Revise motion for sanctions
08/22/22	Roniger, Luke	0.9	749.70	Revise L. Harris declaration in support of Motion for Sanctions
08/22/22	Roniger, Luke	0.4	333.20	Revise Proposed Order for Motion for Sanctions
08/22/22	Roniger, Luke	0.5	416.50	Meet with team regarding next steps for sanctions filing
08/22/22	Roniger, Luke	0.5	416.50	Meet with P. Weeks regarding next steps for Motion for Sanctions filing
08/22/22	Weeks, Paul	0.6	487.05	Participate in calls with L. Roniger to discuss finalization of motion for sanctions papers
08/22/22	Weeks, Paul	0.1	81.18	Participate in call with C. Meyer to discuss draft motion for sanctions, proposed order, and supporting affidavit
08/22/22	Weeks, Paul	1.8	1,461.15	Revise brief in support of motion for sanctions and related papers for filing
08/22/22	Weeks, Paul	2.2	1,785.85	Finalize supporting papers and exhibits in connection with motion for sanctions
08/22/22	Weeks, Paul	1.1	892.93	Implement final edits and comments from team to brief in support of motion for sanctions
08/22/22	Weeks, Paul	2.4	1,948.20	Revise brief in support of motion for sanctions in preparation of filing
08/22/22	Weeks, Paul	0.5	405.88	Participate in call with M. Bush to discuss final edits to brief in support of motion for sanctions
08/22/22	Weeks, Paul	0.1	81.18	Participate in call with L. Harris to discuss final edits to brief in support of motion for sanctions
08/24/22	Roniger, Luke	0.5	416.50	Meet with L. Harris regarding next steps for discovery requests
08/25/22	Michaelson, Andrew	1.3	1,524.90	Analyze correspondence with I. Litvak regarding discovery requests
08/25/22	Roniger, Luke	0.2	166.60	Review transcripts for Litvak statements regarding Defendants' discovery deadlines
08/25/22	Roniger, Luke	0.4	333.20	Draft update for team and Google regarding Defendants' missed discovery deadlines and Litvak misrepresentations
08/25/22	Roniger, Luke	0.3	249.90	Draft response to Litvak regarding Defendants' missed discovery responses
08/25/22	Roniger, Luke	0.2	166.60	Review discovery orders and schedule for response to Defendants' counsel regarding defendants missed deadline on discovery responses
08/29/22	Michaelson, Andrew	0.2	234.60	Analyze timing of discovery responses
08/29/22	Roniger, Luke	0.3	249.90	Draft update to Google regarding next steps for discovery of Defendants and their devices

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08/29/22	Harris, Laura	0.7	678.30	Communicate with client concerning Defendants' discovery responses and motion for sanctions
08/29/22	Roniger, Luke	0.3	249.90	Meet with team regarding next steps for discovery, sanctions, and response to Litvak regarding extension to Defendants' deadline for response to discovery requests
08/30/22	Meyer, Chris	0.1	56.95	Review Litvak letter to court regarding discovery/sanctions
09/02/22	Michaelson, Andrew	2.0	2,346.00	Review Litvak motion for sanctions
09/02/22	Weeks, Paul	0.6	487.05	Participate in calls with L. Roniger to discuss upcoming reply and opposition regarding sanctions motions and discovery to be served
09/02/22	Weeks, Paul	1.1	892.93	Review Defendants' brief in opposition to Google's motion for sanctions and in support of Defendants' motion for sanctions and related filings
09/03/22	Harris, Laura	0.6	581.40	Communication with team regarding opposition for motion for sanctions
09/03/22	Harris, Laura	1.3	1,259.70	Review Opposition to Motion for Sanctions
09/03/22	Weeks, Paul	1.5	1,217.63	Draft analysis of Defendants' opposition to Google's motion for sanctions, and affirmative motion for sanctions, and potential responses thereto
09/04/22	Roniger, Luke	0.7	583.10	Review Defendants' production for purposes of sanctions
09/05/22	Harris, Laura	0.8	775.20	Review defendants' discovery responses
09/05/22	Michaelson, Andrew	1.2	1,407.60	Review Litvak discovery responses
09/06/22	Roniger, Luke	0.4	333.20	Draft and circulate summary of Defendants' Responses and Objections and document production
09/06/22	Roniger, Luke	0.3	249.90	Review Defendants Request for Production responses
09/06/22	Roniger, Luke	0.3	249.90	Review Defendants' interrogatory responses
09/06/22	Sawant, Prachee	0.7	395.68	Review defendants' discovery responses
09/06/22	Weeks, Paul	0.9	730.58	Review Defendants' production and responses to discovery requests
09/06/22	Weeks, Paul	0.2	162.35	Participate in calls with L. Roniger to discuss Defendants' discovery responses and production and actions in response thereto
09/06/22	Roniger, Luke	1.1	916.30	Meet with team regarding next steps for discovery, sanctions response, and settlement outreach with Litvak
09/06/22	Roniger, Luke	0.2	166.60	Meet with P. Weeks regarding sanctions response and next steps for discovery
09/07/22	Roniger, Luke	0.9	749.70	Review Defendants' production and Responses and Objections to Requests for Production and Interrogatories

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09/07/22	Michaelson, Andrew	0.2	234.60	Call with S. Hiers regarding discovery in support of sanctions motion
09/07/22	Weeks, Paul	2.4	1,948.20	Draft portion of reply/opposition sanctions brief in opposition to Plaintiffs' affirmative motion for sanctions
09/07/22	Weeks, Paul	0.3	243.53	Call with M. Bush to discuss strategy for sanctions reply brief
09/08/22	Roniger, Luke	0.5	416.50	Review Defendants' production for meet-and-confer with Defendants' counsel
09/08/22	Roniger, Luke	0.7	583.10	Prepare for meet-and-confer with Defendants' counsel
09/08/22	Michaelson, Andrew	1.9	2,228.70	Confer on discovery tasks in support of sanctions motion
09/08/22	Roniger, Luke	0.6	499.80	Meet with P. Weeks and M. Bush regarding letter to the court and next steps for sanctions Reply/Opposition
09/08/22	Roniger, Luke	0.8	666.40	Meet with P. Weeks regarding next steps for sanctions Reply/Opposition and letter to J. Cote
09/08/22	Roniger, Luke	0.8	666.40	Confer with client regarding letter to J. Cote, Reply/Opposition on sanctions
09/08/22	Roniger, Luke	0.9	749.70	Meet with team regarding next steps for letter to the court, sanctions Reply/Opposition
09/08/22	Weeks, Paul	2.4	1,948.20	Conduct legal research regarding potential for improper settlement demand and terminating sanctions
09/08/22	Michaelson, Andrew	0.7	821.10	Confer with N. Kim, S. Dantiki, L. Harris, L. Roniger and P. Weeks regarding Litvak extortion
09/08/22	Michaelson, Andrew	0.4	469.20	Participate in Rule 408 conference with I. Litvak, L. Harris, L. Roniger and M. Bush
09/08/22	Roniger, Luke	1.1	916.30	Draft letter to J. Cote regarding Defendants' settlement proposal extortion
09/08/22	Roniger, Luke	0.4	333.20	Meet and confer with Defendants' counsel regarding settlement offer
09/08/22	Sawant, Prachee	0.3	169.58	Call with P. Weeks regarding settlement research
09/08/22	Sawant, Prachee	0.9	508.73	Draft summary of caselaw regarding extortion
09/08/22	Sawant, Prachee	1.9	1,073.98	Research caselaw regarding extortion in the context of settlement negotiations
09/08/22	Sawant, Prachee	1.3	734.83	Research caselaw regarding extortion in the context of settlement negotiations
09/08/22	Weeks, Paul	2.3	1,867.03	Conduct legal research regarding criminal liability for extortion in the context of settlement demands in civil litigation
09/08/22	Weeks, Paul	0.5	405.88	Participate in call with L. Roniger to discuss potential letter to the court and research items regarding Defendants' settlement offer

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09/08/22	Weeks, Paul	0.8	649.40	Participate in call with client and King and Spalding to discuss strategy and next steps following Defendants' settlement offer
09/08/22	Weeks, Paul	0.3	243.53	Participate in call with P. Sawant to discuss legal research following Defendants' settlement offer
09/08/22	Weeks, Paul	1.0	811.75	Participate in call with M. Bush to discuss legal issues related to Defendants' settlement offer, strategy for next steps, and implications for opposition/reply sanctions brief
09/08/22	Weeks, Paul	1.0	811.75	Participate in call with team to debrief following call with I. Litvak to discuss Defendants' settlement offer
09/08/22	Weeks, Paul	0.4	324.70	Participate in call with I. Litvak to receive Defendants' proposal regarding settlement
09/09/22	Michaelson, Andrew	0.2	234.60	Confer with S. Hiers regarding discovery
09/09/22	Michaelson, Andrew	0.4	469.20	Advise P. Weeks regarding reply in support of motion for sanctions
09/09/22	Michaelson, Andrew	0.3	351.90	Confer with S. Dantiki regarding discovery in support of sanctions
09/09/22	Weeks, Paul	2.4	1,948.20	Draft recent conduct and discovery section of reply/opposition sanctions brief
09/09/22	Weeks, Paul	1.5	1,217.63	Draft portion of reply/opposition sanctions brief in opposition to Plaintiffs' affirmative motion for sanctions
09/09/22	Weeks, Paul	0.6	487.05	Draft portion of reply/opposition sanctions brief regarding Plaintiffs' argument that sanctions motion is premature
09/09/22	Michaelson, Andrew	0.5	586.50	Advise regarding letter to court regarding extortion
09/09/22	Roniger, Luke	0.6	499.80	Review and revise letter to J. Cote regarding defendants' attempted extortion
09/09/22	Sawant, Prachee	1.9	1,073.98	Research caselaw regarding extortion in the context of settlement negotiations
09/09/22	Sawant, Prachee	0.8	452.20	Draft summary of caselaw regarding lawful and unlawful demands
09/09/22	Sawant, Prachee	2.2	1,243.55	Research regarding extortion
09/10/22	Michaelson, Andrew	1.5	1,759.50	Revise reply brief in support of motion for sanctions
09/10/22	Weeks, Paul	2.3	1,867.03	Draft portion of reply/opposition sanctions brief regarding Plaintiffs' argument that there is a lack of evidence of sanctionable conduct
09/10/22	Weeks, Paul	1.8	1,461.15	Draft portion of reply/opposition sanctions brief regarding Plaintiffs' argument that there is a lack of evidence of prejudice to Google
09/11/22	Weeks, Paul	0.9	730.58	Draft portion of reply/opposition sanctions brief regarding monetary sanctions
09/11/22	Weeks, Paul	2.4	1,948.20	Draft portion of reply/opposition sanctions brief regarding Plaintiffs' intentional spoliation

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09/11/22	Weeks, Paul	1.3	1,055.28	Draft reply/opposition sanctions brief regarding Plaintiffs' argument that sanctions motion is premature
09/11/22	Michaelson, Andrew	0.2	234.60	Revise letter to court regarding settlement offer
09/12/22	Roniger, Luke	0.4	333.20	Meet with M. Bush regarding next steps for discovery and sanctions filing
09/12/22	Roniger, Luke	0.6	499.80	Meet with team for weekly call
09/12/22	Roniger, Luke	0.7	583.10	Meet with P. Sawant and C. Meyer regarding order of proof and next steps
09/12/22	Weeks, Paul	1.7	1,379.98	Revise full draft of reply/opposition sanctions brief
09/12/22	Weeks, Paul	1.9	1,542.33	Draft introduction for reply/opposition sanctions brief
09/12/22	Weeks, Paul	0.5	405.88	Participate in team call to discuss status and draft reply/opposition brief regarding sanctions motions
09/12/22	Michaelson, Andrew	0.2	234.60	Advise regarding correspondence with I. Litvak regarding settlement
09/13/22	Michaelson, Andrew	2.2	2,580.60	Revise reply in support of motions for sanctions
09/13/22	Michaelson, Andrew	2.0	2,346.00	Revise portion of brief opposing defendants' motion for sanctions
09/13/22	Weeks, Paul	1.4	1,136.45	Revise draft reply/opposition sanctions brief
09/13/22	Weeks, Paul	0.4	324.70	Draft email to client with updates and draft reply/opposition sanctions brief
09/13/22	Weeks, Paul	0.1	81.18	Participate in call with A. Michaelson to draft discuss reply/opposition sanctions brief
09/13/22	Weeks, Paul	2.3	1,867.03	Revise draft reply/opposition sanctions brief
09/13/22	Weeks, Paul	0.7	568.23	Confer with A. Michaelson regarding reply/opposition sanctions brief
09/13/22	Weeks, Paul	2.4	1,948.20	Revise draft reply/opposition sanctions brief
09/13/22	Roniger, Luke	1.5	1,249.50	Revise letter to J. Cote regarding defendants' attempted extortion
09/14/22	Michaelson, Andrew	1.2	1,407.60	Revise reply brief in support of motion for sanctions
09/14/22	Roniger, Luke	1.2	999.60	Review facts relating to recent evidence of ongoing operation of the botnet
09/14/22	Roniger, Luke	0.6	499.80	Draft summary regarding Litvak letter and proposed response in sanctions reply

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09/14/22	Michaelson, Andrew	0.2	234.60	Review of Litvak letter to court concerning settlement offer
09/14/22	Roniger, Luke	0.2	166.60	Review Litvak letter regarding extortion threat
09/15/22	Michaelson, Andrew	0.6	703.80	Review of Defendants' discovery responses
09/15/22	Weeks, Paul	0.7	568.23	Participate in call with L. Roniger to discuss Defendants' amended discovery responses
09/15/22	Michaelson, Andrew	2.5	2,932.50	Revise reply in support of motion for sanctions
09/15/22	Roniger, Luke	0.7	583.10	Meet with P. Weeks regarding next steps for sanctions filing
09/15/22	Weeks, Paul	0.3	243.53	Participate in call with M. Bush to discuss finalization of draft reply/opposition sanctions brief
09/15/22	Weeks, Paul	2.4	1,948.20	Revise draft reply/opposition sanctions brief
09/15/22	Weeks, Paul	2.1	1,704.68	Review Defendants' amended discovery responses for proposed revisions draft reply/opposition sanctions brief
09/15/22	Weeks, Paul	0.2	162.35	Participate in call with A. Michaelson to discuss Defendants' amended discovery responses and necessary revisions to the draft reply/opposition sanctions brief
09/16/22	Michaelson, Andrew	0.3	351.90	Review of Litvak letter concerning ability to obtain passports for depositions/discovery
09/16/22	Roniger, Luke	0.9	749.70	Draft letter regarding Google's request to seal Defendants' discovery responses
09/16/22	Harris, Laura	0.8	775.20	Review reply in support of motion for sanctions
09/16/22	Harris, Laura	0.4	387.60	Participate in call with A. Michaelson regarding reply in support of motion for sanctions
09/16/22	Michaelson, Andrew	1.5	1,759.50	Revise reply in support of motion for sanctions
09/16/22	Michaelson, Andrew	0.4	469.20	Confer with P. Weeks regarding reply in support of sanctions
09/16/22	Michaelson, Andrew	0.3	351.90	Confer with L. Harris regarding reply in support of sanctions motion
09/16/22	Roniger, Luke	0.9	749.70	Revise L. Harris declaration ISO Sanctions reply
09/16/22	Weeks, Paul	2.1	1,704.68	Revise reply/opposition sanctions brief based on final edits and comments received from team and client
09/16/22	Weeks, Paul	1.5	1,217.63	Finalize ancillary papers in support of reply/opposition sanctions brief
09/16/22	Weeks, Paul	2.4	1,948.20	Draft declaration in support of motion for sanctions and in opposition to Defendants' motion for sanctions

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09/16/22	Weeks, Paul	2.1	1,704.68	Revise draft reply/opposition sanctions brief based on comments from Defendants' served amended discovery responses
09/16/22	Weeks, Paul	0.7	568.23	Participate in calls with A. Michaelson to discuss potential revisions to draft reply/opposition motion for sanctions brief
09/16/22	Weeks, Paul	2.1	1,704.68	Finalize reply/opposition sanctions brief
09/16/22	Weeks, Paul	0.5	405.88	Communicate with client regarding revised opposition/reply sanctions brief and Defendants' amended discovery responses
09/17/22	Weeks, Paul	0.6	487.05	Communicate with client regarding final reply/opposition sanctions brief and summary of Defendants' letter to the court regarding their pursuit of international passports
09/19/22	Roniger, Luke	0.3	249.90	Meet with P. Weeks regarding next steps for discovery
09/19/22	Weeks, Paul	0.3	243.53	Participate in call with L. Roniger to discuss next offensive discovery requests and action items
09/19/22	Michaelson, Andrew	0.2	234.60	Review courtesy copies of sanctions motion with Court
09/19/22	Meyer, Chris	2.3	1,309.85	Revise briefing regarding motion for sanctions
09/23/22	Weeks, Paul	0.3	243.53	Participate in call with L. Roniger to discuss overall offensive discovery strategy and draft requests
09/23/22	Michaelson, Andrew	1.2	1,407.60	Review defendants' motion for sanctions
09/23/22	Weeks, Paul	0.5	405.88	Review Defendants' reply memorandum of law in support of their motion for sanctions and supporting declaration
09/26/22	Meyer, Chris	0.6	341.70	Review defendants' memorandum of law for sanctions
09/26/22	Meyer, Chris	0.6	341.70	Review Litvak declaration on discovery
09/26/22	Roniger, Luke	0.7	583.10	Communicate with team regarding defendants' sanctions reply and next steps for strategy going forward
09/28/22	Roniger, Luke	0.2	166.60	Meet with S. Hiers regarding talking points for meet-and-confer with Litvak regarding Defendants deficient production
09/28/22	Weeks, Paul	0.2	162.35	Participate in team call to discuss proposed next steps in offensive discovery
09/30/22	Roniger, Luke	0.6	499.80	Prepare for meet-and-confer with I. Litvak regarding deficient discovery responses
10/01/22	Michaelson, Andrew	0.4	469.20	Advise regarding settlement strategy
10/02/22	Roniger, Luke	0.3	249.90	Draft and circulate agenda and outstanding settlement tasks
10/02/22	Roniger, Luke	0.3	249.90	Review and compile prior correspondence for settlement outreach to Litvak

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10/03/22	Roniger, Luke	0.4	333.20	Call with team regarding settlement strategy
10/03/22	Roniger, Luke	0.2	166.60	Research for settlement agreement draft.
10/03/22	Roniger, Luke	2.3	1,915.90	Draft and circulate proposed settlement agreement for outreach to Defendants' counsel
10/03/22	Weeks, Paul	0.4	324.70	Participate in call with S. Heirs to discuss draft settlement agreement
10/03/22	Weeks, Paul	0.1	81.18	Review client email regarding settlement outreach to Defendants.
10/03/22	Weeks, Paul	0.5	405.88	Participate in team call to discuss recent case developments and settlement outreach to Defendants
10/04/22	Michaelson, Andrew	0.5	586.50	Advise regarding draft settlement agreement
10/04/22	Roniger, Luke	0.8	666.40	Revise and circulate updated settlement agreement
10/04/22	Weeks, Paul	0.2	162.35	Review draft settlement agreement
10/05/22	Michaelson, Andrew	0.2	234.60	Confer with L. Harris regarding draft settlement agreement
10/05/22	Roniger, Luke	1.0	833.00	Review and revise draft settlement agreement
10/07/22	Harris, Laura	0.6	581.40	Review of potential settlement and communication regarding same
10/07/22	Roniger, Luke	0.2	166.60	Draft and circulate proposed settlement correspondence
10/07/22	Roniger, Luke	1.7	1,416.10	Revise draft settlement agreement
10/07/22	Sawant, Prachee	0.7	395.68	Edit and re-format settlement agreement
10/07/22	Sawant, Prachee	0.9	508.73	Edit settlement agreement
10/10/22	Harris, Laura	0.4	387.60	Call with team concerning potential settlement
10/10/22	Harris, Laura	0.8	775.20	Review of draft settlement agreement
10/10/22	Roniger, Luke	1.2	999.60	Revise settlement agreement
10/10/22	Roniger, Luke	0.5	416.50	Email team regarding updates to settlement agreement and outreach to Defendants
10/10/22	Roniger, Luke	0.3	249.90	Meet with team regarding next steps for settlement

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10/10/22	Weeks, Paul	0.3	243.53	Participate in team call to discuss settlement outreach to named defendants and next steps
10/11/22	Harris, Laura	0.3	290.70	Participate in call with I. Litvak regarding potential settlement
10/11/22	Harris, Laura	0.8	775.20	Communication with team and client concerning potential settlement
10/11/22	Roniger, Luke	0.5	416.50	Meet with L. Harris regarding next steps for potential settlement with Defendants
10/11/22	Roniger, Luke	0.2	166.60	Meet and confer with Defense counsel regarding potential settlement
10/11/22	Roniger, Luke	0.7	583.10	Draft and circulate summary regarding Defendants' proposed settlement terms
10/11/22	Roniger, Luke	0.8	666.40	Meet with team regarding next steps for settlement
10/11/22	Weeks, Paul	0.2	162.35	Review emails regarding call with Defendants' counsel to discuss settlement offer
10/12/22	Harris, Laura	0.4	387.60	Preparation for call with I. Litvak regarding potential settlement
10/12/22	Harris, Laura	0.3	290.70	Participate in call with I. Litvak regarding potential settlement
10/12/22	Harris, Laura	0.5	484.50	Analyze Defendants' settlement offer
10/12/22	Harris, Laura	0.6	581.40	Communicate with client concerning Defendants' settlement proposal
10/12/22	Roniger, Luke	0.9	749.70	Revise settlement agreement with proposed Appendix and updated language regarding allegations against Defendants
10/12/22	Roniger, Luke	0.2	166.60	Meet with L. Harris regarding response to Defendants
10/12/22	Roniger, Luke	0.4	333.20	Draft and circulate update regarding revisions to settlement agreement and next steps
10/12/22	Roniger, Luke	0.2	166.60	Meet with L. Harris and defense counsel for meet-and-confer regarding potential settlement
10/12/22	Roniger, Luke	0.2	166.60	Email team regarding edits to settlement agreement and next steps
10/13/22	Harris, Laura	0.4	387.60	Communicate with I. Litvak regarding settlement proposal
10/13/22	Harris, Laura	0.2	193.80	Communication with client concerning settlement proposal
10/14/22	Harris, Laura	0.5	484.50	Communication with client regarding settlement proposal
10/15/22	Michaelson, Andrew	0.2	234.60	Advise S. Dantiki and L. Harris regarding settlement strategy

Exhibit 1 to L. Harris Decl. ISO Google's Motion for Attorneys' Fees

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